

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGI PORTAL LLC,

Plaintiff,

v.

VIVID SEATS LLC,

Defendant.

C.A. NO. _____

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Digi Portal LLC files this Original Complaint for Patent Infringement against Vivid Seats LLC and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Digi Portal LLC (“Digi Portal” or “Plaintiff”) is a Texas limited liability company with a place of business at 101 E. Park Blvd, Suite 600, Plano, Texas 75074.

2. On information and belief, Defendant Thryv, Inc. (“Defendant”) is a limited liability company organized and existing under the laws of Delaware, with a place of business at 111 N. Canal St., Chicago, IL 60606. Defendant has a registered agent at Cogency Global Inc., 850 New Burton Road Suite 201, Dover, DE 19904.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged

herein. Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware limited liability company.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware. Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is a Delaware limited liability company. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,352,854)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On January 8, 2013, United States Patent No. 8,352,854 ("the '854 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '854 Patent is

titled “Dynamic Page Generator.” The ‘854 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 1270 days. (Ex. A). A true and correct copy of the ‘854 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Digi Portal is the assignee of all right, title and interest in the ‘854 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘854 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘854 Patent by Defendant.

11. The application leading to the ‘854 patent is a continuation of U.S. application Ser. No. 11/656,636, filed Jan. 22, 2007, which is a continuation of U.S. application Ser. No. 09/393,718, filed Sep. 10, 1999, which is a continuation of U.S. application Ser. No. 08/873,975, filed Jun. 12, 1997. (Ex. A at cover). The ‘854 patent was first assigned to Yahoo! Inc. (*Id.*).

12. The invention in the ‘854 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:26-30).

13. Web servers for serving static web pages were well known in the global Internet. (*Id.* at col. 1:31-32). Such static web pages are useful in many applications whether the information presented to each requesting user is the same. (*Id.* at col. 1:32-34). However, some applications require customization to appeal to users. (*Id.* at col. 1:34-35). One example is presenting news to users. (*Id.* at col. 1:35-37). When static pages are used, a user will often have to scroll through many topics not of interest to that user to get to the information of interest. (*Id.* at col. 1:37-40). However, when presenting news to users, customized web pages present

news that is more relevant to the requesting user than static pages because the information is filtered according to each user's interest. (*Id.* at col. 1:35-37, 40-41).

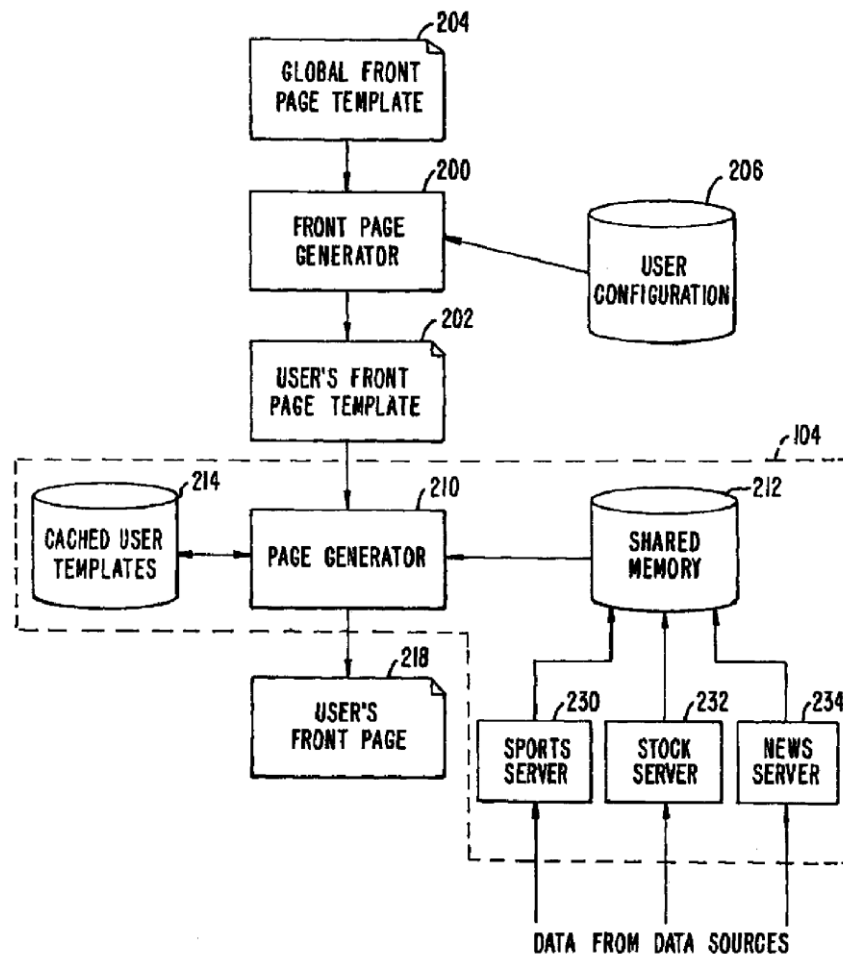
14. Customizing a server response based on the requester is known; however, known systems do not scale well. (*Id.* at col. 1:42-43). One method of serving custom pages is to execute a script, such as a Common Gateway Interface (CGI) script or other program to collect the information necessary to generate the custom page. (*Id.* at col. 1:43-47). For example, if the custom page is a news page containing stock quotes, sports scores and weather, the script might poll a quote server to obtain the quotes of interest, poll a sports score server to obtain the scores of interest and poll a weather server to obtain the weather. (*Id.* at col. 1:47-51). With this information, the server generates the custom page and returns it to the user. (*Id.* at col. 1:51-52). This approach is only useful where there are not many requesters and where the attendant delay associated with polling various servers to obtain the requested information is acceptable to users. (*Id.* at col. 1:53-54). Growing impatience with waiting will turn users away from such servers, especially as use increases. (*Id.* at col. 1:54-58).

15. One approach that was used in the prior art to avoid long waits is to transfer the custom information in non-real-time, so that the information is stored local to the user as it arrives and is presented to the user on request. (*Id.* at col. 1:59-62). A disadvantage of such a system is that the networks used by the user become clogged with data continually streaming to the user and require large amounts of local storage. (*Id.* at col. 1:62-65). Another disadvantage is that the locally stored information will become out of date as the server receives new data. (*Id.* at col. 1:65-67).

16. The inventors therefore recognized that there was a need to dynamically generate customized pages in an unconventional manner that solved the technical problems in the prior art

of long transfer times to obtain the requested information or having to rely on continually transferring custom information in non-real time which can clog the data network in addition to providing outdated information. (*Id.* at col. 1:42 to col. 2:2).

17. The following is a discussion of non-limiting examples of the claimed invention discussed in the specification of the '854 patent. The '854 patent provides a non-limiting exemplary diagram of the generation of a custom page for a user, using a front-page generator (200) and page server (104) (*Id.* at col. 3:58-60):



(Ex. A at Fig. 2). Front page generator (200) generates a user template (202) from a global front page template (204) and a user configuration record (206). (*Id.* at col. 3:58-62). A non-limiting example of a global front page template is provided in the '854 patent:

```

<html>
<head>
<title>My Yahoo! news summary for <!-- login --></title>
</head>
<body>

<center>
<!-- banner:sum -->

<!-- ad -->
<!-- nav bar --> 302
</center>

<table border=1 cellpadding=4 cellspacing=0 width=100%>
<tr><td align=center valign=top width="1%">
<!-- leftside:nsum --> 302
<p></td>
<td align=center valign=top width="100%">
<!-- mode bar:"FRONT PAGE" -->
<!-- channel:nsum --> 302
</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width=100%>
<!-- motd:motn.html -->
</table>
</center>
<!-- search -->

<!-- copyright:sum -->

</body>
</html>

```

204

(Ex. A at Fig. 3). The global user template (204) is an HTML (HyperText Markup Language) document with additional tags as placeholders for live data. (*Id.* at col. 5:16-19). Several placeholders (302) are shown in the code. (*Id.* at col. 5:19).

18. A user configuration record (206) is a record selected from user configuration database (116). (*Id.* at col. 3:63-64). User configuration information includes user demographic information, such as sex, age, location, stock quotes, favorite sports teams, news topics, etc. (*Id.* at col. 2:13-14, col. 5:45-50, col. 6:37-39, 46-48, 52-56). The user configuration information in the example may not change until the user changes his or her preferences. (*Id.* at col. 5:33-35).

19. The '854 patent provides an illustration of a user template (202) as might be generated from global user template (204) and a user configuration record (206):

202

```

    <!-- timezone:-8,PT 0 -->
    <!-- ad:M,85,95035,T,* 792 -->
    <!-- portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
404 { 2836 -->
    <!--
    scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NFLSFO
    ,NLSFO 3803 -->
    <!-- weather:f,30901,uk_londo,94601,95101 4368 -->
    <!--
    mode_bar:"FRONT_PAGE",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/news
    /summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
    <!-- motd:us_motn.html 4696 -->
    <html>
    <head>
    <title>My Yahoo! news summary for ash802</title>
    </head>
    <body>

    ...

    </body>
    </html>

```

(Ex. A at Fig. 4). The user template is unique because it is built based on user demographic information provided by the user, as opposed to generically chosen dynamic information or based on information provided by the server. Exemplary demographic information is shown in line 2 of Fig. 4 (“:M,85,95035,T,*”) indicating that the user is a male, age 85, located in zip code 95035, etc. (*Id.* at col. 5:42-45). The ‘854 patent includes a full listing of the non-limiting exemplary user template of Fig. 4 in Appendix A. (Ex. A at col. 2:57-58; col. 5:22-23).

Listing of a User Template

```

<!-- timezone: -8,PT 0 -->
<!-- ad:M,85,95035,T,* 792 -->
<!--
portfolio:Quotes,pf_1,1, ^DJI, ^NYA, ^IXIC, ^SPX, ^XAX,YHOO,NSCP,IOM,NSCP,YHOO
2836 -->
<!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NF
LSFO,NLSFO 3803 -->
<!-- weather:f,30901,uk_londo,94601,95101 4368 - - >
<!--
mode_bar:"FRONT_PAGE1",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/
news/summary.html?v 4538 -->
<!-- summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
<!-- motd:us__motn.html 4696 -->
<html>
<head>
<title>My Yahoo!news summary for ash802</title>
</head>
<body>

<center>
<map name="top"><area shape=rect coords="0,0,45,66"
href="/news/summary.html?v"><area shape=rect coords="45,0,90,66"
href="/internet/directory.html?v"><area shape=rect coords="90,0,135,66"
href="/contacts/white_pages.html?v"><area shape=rect coords="135,0,346,66"
href="/myHome"><area shape=rect coords="346,0,389,66"
href="/help/news/summary.html"><area shape=rect coords="389,0,431,66"
href="http://edit.my.yahoo.com/config/eval_profile"><area shape=rect
coords="431,0,477,66" href="http://edit.my.yahoo.com/config/tofill">
</map>
<center><a href="/bin/top__menu"></a></center>

<p>
<center><form action="http://search.my.yahoo.com/search/my"> <font
size="-2">[ <a
href="http://edit.my.yahoo.com/config/set_attr?attr=sloc&value=b&.done=htt
p://my.yahoo.com/news/summary.html?v">move to bottom</a> ] </font><input
size=25 name=p> <font size="-1">&nbsp;  <input type=submit
value=Search><input type=hidden name=n value="25"> &nbsp;  <a
href="http://search.my.yahoo.com/search/my/options">Options</a></font></fo
rm></center><p>
<center>
<table border=0 cellpadding=2>
<tr>
<td align=center><font
color="#000000"><b>Sections:</b>&nbsp;&nbsp;&nbsp;</font></td>
<td align=center bgcolor="#dcdcdc"><font
color="#000000"><b>Front&nbsp;&nbsp;&nbsp;Page</b></font></td>
<td>&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</td>
<td align=center><a href="/news/business/summary.html?v">Business</a></td>
<td>&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</td>
<td align=center><a
href="/news/portfolio_summary.html?v">Portfolios</a></td>
<td>&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</td>
<td align=center><a
href="/news/entertainment/summary.html?v">Entertainment</a></td>
<td>&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</td>
<td align=center><a href="/news/sports/summary.html?v">Sports</a></td>
<td>&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;&nbsp;</td>
<td align=center><a
href="/news/technology/summary.html?v">Technology</a></td>
</tr>
</table>
</center>
</center>
<table border=1 cellpadding=4 cellspacing=0 width="100%">
<tr><td align=center valign=top width="1%">
<a
href="http://edit.my.yahoo.com/config/eval_left?mode=left_nsum&.done=http%
3a%2f%2fmy%2eyahoo%2ecom%2fnews%2fsummary%2html%3fv"></a>
<table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=4 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><b><font
size="+1">P<font size="+0">ORTFOLIOS</font></font></b></td><td>

```



```

align=right">ca
href="http://edit.my.yahoo.com/config/eval_quotes?.done=http://my.yahoo.co
m/news/summary.html?v"></a></td></tr></table></td></tr>
<tr><td align=center colspan=4>cform method=get
action="http://quote.yahoo.com/quotes"><font size="-1"><input type=text
size=10 name=symbols><input type=submit value="Get Quotes"><br><font
size="0">quotes delayed 20 minutes - <a
href="/fin_disclaimer.html">disclaimer</a><br>click on symbol for detailed
quote + news<br><b>*</b> indicates new news during last
24hrs<font></form></td></tr></table>
<br size=0><table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=5 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/sum/?http://sports.yahoo.com/"><b><font size="+1">S<font
size="+0">COREBOARD</font></b></a></td><td align=right><a
href="http://edit.my.yaho9.com/config/set_sports?.done=http://my.yahoo.com
/news/summary.html?v"></a></td></tr></table></td></tr>
<br size=0><table border=0 cellpadding=2 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=3 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a
href="/my/?http://weather.yahoo.com/"><b><font size="+1">W<font
size="+0">EATHER</font></b></a></td><td align=right><a
href="http://edit.my.yahoo.com/config/set_wni?.done=http://my.yahoo.com/ne
ws/summary.html?v"></a></td></tr></table></td></tr>
<tr><td align=center colspan=3><font size=0>click on city for extended
forecast</font></td></tr>
</table>
<br size=0>
<p></td>
<td align=center valign=top width="100%">
<table border=1 cellpadding=2 cellspacing=0 width="100%">
</table>
</td></tr>
</table>
<center>
<table border=1 cellpadding=2 cellspacing=0 width="100%">
</table>
</center>
<p>
<br>
<center>
<table border=0 cellpadding=0 cellspacing=0 width="100%">
<tr>
<td align=left valign=top><table border=0 cellpadding=0 cellspacing=0>
<tr><td align=left valign=bottom><a href="/my/?http://www.yahoo.com/"></a></td>
<td>&nbsp;&nbsp;&nbsp;& &nbsp;&nbsp;& </td>
<td align=left valign=bottom width="100%"><font size="-1"><i>Copyright
&copy; 1994-1997 Yahoo! Inc. All rights reserved.</i><br>Portions
copyright &copy; 1997 Reuters Ltd. All rights reserved.<br>
Portions copyright &copy; 1997 SportsTicker Enterprises LP. All rights
reserved.<br>
Portions copyright &copy; 1997 Weathernews Inc. All rights reserved.<br>
Portions copyright &copy; 1997 Business Wire. All rights reserved.<br>
Portions copyright &copy; 1997 PR Newswire. All rights reserved.<br>
Questions, comments, or suggestions? Send us <a
href="http://my.yahoo.com/feedback.html">feedback</a>.</font></td>
</tr>
</table>
</tp>
<td>&nbsp;&nbsp;& &nbsp;&nbsp;& </td>
<td align=right><a href="/bin/logout_menu"></a></td>
</tr>
</table>
</center>
<map name=logout>
<area coords="0,0,50,68" href="/my/?http://www.yahoo.com/">
<area coords="51,0,100,68"
href="http://edit.my.yahoo.com/config/login?logout=1">
</map>

</body>
</html>

```

(Ex. B at Col. 7-11).

20. As shown in Fig. 2 of the ‘854 patent, the user template does not need to be generated each time and instead can be generated and stored. (Ex. A at col. 4:49-51, col. 5:23-32). One benefit of the claimed invention that speeds up the operation of the dynamic page generation is that the page can be stored in multiple locations that are based on the frequency by which the user requests the customized page based on the user template. (*Id.* at col. 5:37-38, col. 6:49-59). Some users might choose to access their user page infrequently, while others might choose to access their front page hourly. (*Id.* at col. 6: 52-54). For infrequent users, the user template is stored in a user configuration database, whereas for frequent users the user template may also be stored in cache. (*Id.* at col. 5:37-38, col. 6:51-59). Caching reduces the time to respond to a request for a page and is more effective where the typical user makes several requests in a short time span and then doesn’t make any requests for a long period of time. (*Id.* at col. 5:29-32).

21. When the user template stored in cache, it may be stored long enough to be reused and may also be flushed from cache if the user page has been inactive for several days. (*Id.* at col. 6:49-52, 59-60). Even if it is flushed from cache, the user template can be maintained in the user configuration database, which can then be quickly accessed and stored in cache in the event a user may start to access the user page quickly. (*Id.*).

22. The custom user page can also include an advertisement that is selected based on the user demographic information. (*Id.* at col. 5:39-42). For example, using the demographic information “:M,85,95035,T,*”, an advertisement can be selected that is targeted for a male user, age 85, located in zip code 95035, etc. (*Id.* at col. 5:39-45).

23. Appendix B of the ‘854 patent is an HTML source code listing of an HTML page created from an executed user template that is used to generate a user customized browser web page. (Ex. B at col. 11 – col. 19).

24. As explained the ‘854 patent and prosecution history, there are unconventional and non-generic features of the claimed invention which are technical improvements that make the generation of dynamic web pages quicker, more efficient, and use less resources. By storing the user customized template program in two locations in which the location is determined by frequency, the system is more efficient and allows for a quicker response than the prior art. For example, by storing the user customized template in user configuration database and in cache, the dynamic generation of a user customized web page is more efficient and uses less resources of the server, database, and network, and allows for a quicker generation of the dynamic web page thereby allowing the server to scale in order to handle substantially more requests for user customized dynamic web pages. (*See* Ex. A at col. 1:42-67, col. 4:49-col. 5:15, col. 5:23-32). Furthermore, by caching the user template, the page can be generated entirely within a page server, thus conserving network and database resources. (*See id.* at col. 4:10-11, col. 5:23-32). By also storing the user customized template in a user configuration database, even if the cache is cleared, the template already exists in the database which then prevents having to regenerate a new user customized page from a global page template using a user configuration record thus saving database and server resources and more quickly generating the requested web page from

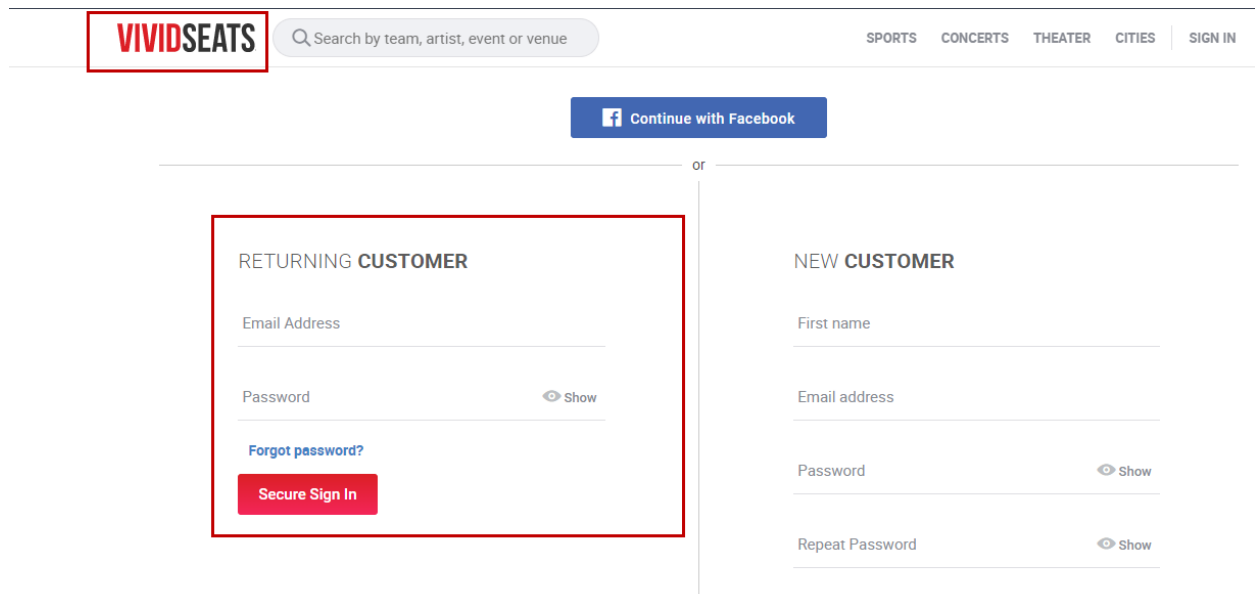
the user customized template. (*E.g., id.* at col. 3:37-39, col. 4:1-11, 49-62). The storage of a user customized template program in at least two locations and the location determined from the frequency of the user request for the customized page was an unconventional and non-generic method for storing such templates and was not disclosed in the prior art. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9).

25. Furthermore, the invention provides for more personalized web pages because the user provides user configuration information on which the user customized template is generated. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9; Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6). This was an unconventional way for generating a user customized template unique to the user that was not found in the prior art. (Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6).

26. The patents related to the ‘854 patent and sharing the same specification were cited during the prosecution history of over 700 patents, including patents and applications owned by companies including Google, Inc., Microsoft Corporation, Amazon Technologies, Inc., Facebook, Inc., Ebay, Inc., Salesforce.com, Inc., IBM Corporation, Oracle International Corporation, Comcast Cable Communications, LLC, SAP AG, Citrix Systems, Inc., BEA Systems, Inc., Sprint Communications Company L.P., Siemens AG, AT&T Intellectual Property I, L.P., Hewlett-Packard Development Company, L.P., Fujitsu Limited, AOL LLC, General Electric Company, Accenture LLP, Adobe Systems Inc., Sony Computer Entertainment Inc., and Akamai Technologies, Inc. (See <http://patft.uspto.gov/netacgi/nph-Parser?Sect1=PTO2&Sect2=HITOFF&p=1&u=%2Fnetacgi%2Fsearch-bool.html&r=0&f=S&l=50&TERM1=5983227&FIELD1=UREF&co1=AND&TERM2=&FIELD2=&d=PTXT>).

27. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1-3, 8-9, and 15 of the ‘854 patent in Delaware, and elsewhere in the United States, by performing the claimed method, using the claimed computer-readable non-transitory medium storing computer instructions, and/or making and/or using the claimed system at Vividseats.com (“Accused Instrumentality”).

28. The Accused Instrumentality performs the step of receiving a user request for a customized page. For example, Vividseats.com receives a user request for a user customized page:



The screenshot displays the Vividseats website's login interface. At the top, the Vividseats logo is on the left, a search bar is in the center, and navigation links for SPORTS, CONCERTS, THEATER, CITIES, and SIGN IN are on the right. Below the header is a blue button labeled 'Continue with Facebook'. A horizontal line with the word 'or' in the center separates this from the login forms. On the left, the 'RETURNING CUSTOMER' form is highlighted with a red border; it includes fields for 'Email Address' and 'Password' (with a 'Show' toggle), a 'Forgot password?' link, and a red 'Secure Sign In' button. On the right, the 'NEW CUSTOMER' form includes fields for 'First name', 'Email address', 'Password' (with a 'Show' toggle), and 'Repeat Password' (with a 'Show' toggle).

(E.g., <https://www.vividseats.com/Login.action>).

VIVIDSEATS Search by team, artist, event or venue

SPORTS CONCERTS THEATER CITIES MY ACCOUNT

Welcome ROBERT

Dashboard

Order History

Listing Manager

Profile

Help Center

Looking for real-time responses to pressing questions? Our agents are here to assist you.

Contact us

ACCOUNT INFORMATION

First Name Email Password

A first name is required. Update Email Address Change Password

Update

SAVED ADDRESSES

You have no saved addresses.

SAVED PAYMENT METHODS

You have no saved payment methods.

FEEDBACK

(<https://www.vividseats.com/account/Profile.action> (for a particular user)).

29. The Accused Instrumentality performs the step of receiving a template program (*e.g.*, software instructions and data used for rendering a particular user's Vividseats.com page such as a JavaScript page) that is unique to the user and based on user configuration information (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user). The user configuration information is supplied by the user (*e.g.*, a user defines the information the user's template will display by inputting information such as the user's location; a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as the user's location) and used to build the template program that is unique to the user (*e.g.*, user profile and user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page).

```
<html class="no-js" lang="en-US">
<head>...</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page scroll-lock">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">...</div>
  <aside id="newsletterModal" class="vdp-modal" data-state="closed">...</aside>
  <aside id="regionHandlerModal" class="vdp-modal--sheet--md" data-state="opened" data-scrollable="true">
    <div class="vdp-modal__container">
      <div class="vdp-modal__header">...</div>
      <div class="vdp-modal__body">
        <div id="regionError"></div>
        <div id="regionsList">
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <input class="vdp-control__input" type="radio" data-region="37" hidden>
            <span class="vdp-control__span"> == $0
              ::before
              "AZ - Arizona"
            </span>
          </label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
          <label class="vdp-control--radio--block">...</label>
        </div>
      </div>
    </div>
  </aside>
</body>
</html>
```

Location input terms initially stored in variables

(<https://www.vividseats.com/> (for a particular user)).

```

e=!window.Vivid&&!window.Vivid.Analytics&&!window.Vivid.Analytics.getPageMetaDate()&&window.Vivid.Analytics.getPageMetaDate().Event;if(!e)return{};var t={},n=e.eventSubCategory,r=e.eventName,i=e.eventCategory;if(n){var o=n.split(":");t.event_category=2===o.length?o[1]:n}return r&&(t.event_name=r),i&&(t.event_type=i),t}function j(e,t){va
n=void 0===t?e:++t+.tpl.html",r=e+"."+t,i}<h4>Failed to load template: "+t+"</h4>;return""==t[r]?"":(c.a.ajax({method:"GET",async:!1,url:n,dataType:"text",success:function(e)
{i=e,[r]=i,error:function(e,t,r){i="<p>"+ "Error getting Template: "+t+"; Text: "+t+"; Error: "+r+"</p>";}});function N(e){return"/%."+test(e)?e.replace(/(.*/),"$1")}function D(e,t)
{var n,r=!1;try{window.localStorage.setItem("vs ls test",123),window.localStorage.removeItem("vs ls test"),r=!0}catch(e){r=!1;if(null!=t)"object"===x(t)&&(t=JSON.stringify(t)),r?
window.localStorage.setItem(e,t):(e=t,30);else if(void 0===t){n=?window.localStorage.getItem(e):function(e){for(var t=e+"=",n=document.cookie.split(";"),r=0,i=n.length;r<i;r++)for(va
o=n[r],"===o.charAt(0);o=o.substring(1,o.length));if(0===o.indexOf(t))return o.substring(t.length,o.length)}return null}};try{r=JSON.parse(n)}catch(e){n=n)return n}null===t&&(r
=window.localStorage.removeItem(e):i(e),1)}function i(e,t,n){var r,i=new Date().setTime(i.getTime()+24*n*60*60*1e3),r=i; expires="i.toGMTString()",document.cookie=e+"="+t+r+";
path=/";function I(){if(!/ip(hone|od|ad)-test(navigator.platform)/){var e=navigator.appVersion.match(/OS (\d+) (\d+)?

```

(E.g., <https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js>)

(for a particular user)).

```

return(new Date).getTime())function i(e){return JSON.stringify(pt.isUndefined(e)?null:e)}function o(e){return JSON.parse(e)}(),gt=function(){function e(e){pt.bindAll(this,e,e=
[]),this.sizelimit=e.sizelimit||10,this.cache={},this.cachedKeysByAge=[]}return pt.mixin(e.prototype,{get:function(e){return this.cache[e]},set:function(e,t){var
1:this.cachedKeysByAge.length==this.sizelimit&&(n=this.cachedKeysByAge.shift(),delete this.cache[n]),this.cache[e]=t,this.cachedKeysByAge.push(e)}},e)},yt=function(){var e,t,n=0,r=
};function i(n){pt.bindAll(this),n.pt.isString(n)?url:n=t|new gt,e=pt.isNumber(n.maxParallelRequests)?
1:n.maxParallelRequests:e|6,this.url=n.url,this.wildcard=n.wildcard||"%QUERY",this.filter=n.filter,this.replace=n.replace,this.ajaxSettings=
{type:"get",cache:n.cache,timeout:n.timeout,dataType:n.dataType||"json",beforeSend:n.beforeSend},this._get=(!/^throttles$/i.test(n.rateLimitFn)?pt.throttle:pt.debounce)
(this._get,n.rateLimitWait||300)}return pt.mixin(i.prototype,{get:function(e,n){var r=this;function i(i){var o=r.filter(r.filter(i,i))&&n(o),t.set(e,i)}o()?
this._sendRequest(e).done(i):this.onDeckRequestArgs=[].slice.call(arguments,0),_sendRequest:function(e){var t=this,i=r[e];return i|
(n++,i[r]=c.a.ajax(e,this.ajaxSettings).always((function(){void n--.r[e]=null,t.onDeckRequestArgs&&
(t._get.apply(t,t.onDeckRequestArgs),t.onDeckRequestArgs=null)})),i)},get:function(e,n){var r,i,o=this,a=encodeURIComponent(e||"");return n=n||pt.noop,r=this.replace?
this.replace(this.url,a),this.url.replace(this.wildcard,a),(i=t.get(r))?pt.defer(function(){(n.o.filter?o.filter(i:i)):this._get(r,n,!!i)}),i;function o(){return n(e)
}),t=function(){var e="thumbprint",t="protocol",n="itemHash",r="adjectiveList";function i(e){pt.bindAll(this),isString(e.template)&&e.engine&&c.a.error("no template engine
specified")},a locally executable example a sample page of local prototype as a sample is

```


(E.g., <https://a.vstatic.com/web/a1a342fbc051cec579fa43772559a9e8/home/home.bundle.js>).

```
{})},{}catch(e){return!1}var ve=function(e){W()(r,e);var t,n=(t=r,function(){var e,n=X()(t);if(ge()){var r=X()(this).constructor;e=Reflect.construct(n,arguments,r)}else
e=n.apply(this,arguments);return $(this,e)});function r(){var e;U()(this,r);for(var t=arguments.length,o=new Array(t),i=0;i<t;i++)o[i]=arguments[i];return e=n.call.apply
[this].concat(o),l()(H()(e),"REGION_IDS",{CURRENT_LOCATION:-1,ALL_LOCATIONS:0}),l()(H()(e),"state",{errorMessage:""}),l()(H()(e),"changeRegion",(function(t)
{window.trackLocationFabAnalytics("Select"),t===e.REGION_IDS.CURRENT_LOCATION?(e.setState({isLoadingNewRegion:!0}),window.navigator.geolocation?
window.navigator.geolocation.getCurrentPosition(e.applyCurrentLocation,e.onRegionError):e.onRegionError()):(re.a.get("/Region.action",{params:{region.id":t},headers:
{Accept:"application/json, text/javascript, */*", "Cache-Control": "no-cache"}})).then((function(n){var
r=n.data;e.applyRegionChange(t,Number(r.secondaryId),Number(r.tertiaryId)))).catch((function(t){p(t,{message:"Error getting
region"}),e.onRegionError()})),window.Vivid.Analytics.fireInteractionAnalyticsEvent({eventCategory:"LocationSelectionUse",eventAction:"SubCategoryPageLocationDropdown",ever
ing()}))},l()(H()(e),"applyCurrentLocation",(function(t){var n=t.coords.latitude,r=t.coords.longitude;re.a.get("/Region.action?applyGeoLocation",{params:
{latitude:n,longitude:r},headers:{Accept:"application/json, text/javascript, */*", "Cache-Control": "no-cache"}})).then((function(t){var n=t.data,r=n.id,o=void 0===r?
(E.g., https://a.vstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js).
```

30. The user configuration information supplied by the user to build the template program includes user demographic information (e.g., a user's profile information and/or configuration information such as the user's location and other information). (E.g., <https://www.vividseats.com/account/Profile.action>; <https://www.vividseats.com/privacy.html>).

31. The template program is received from one of at least two locations (e.g., the data and templates comprising a user's page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized Vividseats.com page (e.g., based on the frequency at which a user logs in or accesses their Vividseats.com page, the data comprising the users page may be stored at a main server). On information and belief, the accused instrumentality uses the template program that is unique to the user which is generated using customization information unique to the user and a global template that is generic to a plurality of users. On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in local storage on the user's computer. On information and belief, running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. When a user signs-up or performs a login, the code takes the user template

information and stores it in a site JavaScript object that is used in logic to display various available events and other site logic-based conditions. The user information is stored in multiple locations, which can include, (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies. The JavaScript code shown below from the front-facing publicly available code, demonstrates that the sign-in is handled via JavaScript. The actual JS file is served from a CDN.

```

e=!window.Vivid&&!window.Vivid.Analytics&&!window.Vivid.Analytics.getPageMetaDate()&&window.Vivid.Analytics.getPageMetaDate().Event;if(!e)return{};var t={},n=e.eventSubCategory,r=e.eventName,i=e.eventCategory;if(n){var o=n.split(":");t.event_category=2===o.length?o[1]:return r&&(t.event_name=r),i&&(t.event_type=i),t}function j(e,t){va
n=void 0===t?t+":tpl.html",r="+",t,i="<div>Failed to load template: "+t+"</div>";return""==t[r]?":(c.a.ajax({method:"GET",async:!1,url:n,dataType:"text",success:function(e
{i=e,t[r]=i},error:function(e,t,r){i="<p>"+("Error getting Template: "+t; Text: "+t+"; Error: "+r)+"</p>";i}}function N(e){return"/#/test(e)?e.e.replace(/(.*?)/,"$1"))function D(e,t
{var n,r=!1;try{window.localStorage.setItem("vs ls test",123),window.localStorage.removeItem("vs ls test"),r=!0}catch(e){r=!1;if(null!=t)"object"===x(t)&&(t=JSON.stringify(t)),r?
window.localStorage.setItem(e,t):(e=i,e,t,30);else if(void 0===t){n=r?window.localStorage.getItem(e):function(e){for(var t="=",n=document.cookie.split(";"),r=0,i=n.length;r<i;r++)for(va
o=n[r],"===o.charAt(0);o=o.substring(1,o.length);if(void 0===o.indexOf(t))return o.substring(t.length,o.length)}return null);try{n=JSON.parse(n)}catch(e){n=nreturn n>null===t&&?n
window.localStorage.removeItem(e):(e="","",1)}function i(e,t,n,r,i=new Date,i.setTime(i.getTime()+24*n*60*60*1e3),r=i; expires="+i.toGMTString(),document.cookie=e+"="+t+r;
path="/");function I(){if(!/ip(hone)od/ad/.test(navigator.platform)){var e=navigator.appVersion.match(/OS (\d+) (\d+)?

```

(E.g., <https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js>)

(for a particular user)).

```

[return(new Date).getTime()})function i(e){return JSON.stringify(pt.isUndefined(e)?null:e)}function o(e){return JSON.parse(e)}}(),gt=function(){function e(e){pt.bindAll(this),e=el
[],this.sizeLimit=e.sizeLimit|10,this.cache={},this.cachedKeysByAge=[]}return pt.mixin(e.prototype,{get:function(e){return this.cache[e]},set:function(e,t){var
1,this.cachedKeysByAge.length===this.sizeLimit&&(n=this.cachedKeysByAge.shift(),delete this.cache[n]),this.cache[e]=t,this.cachedKeysByAge.push(e)}},e)},yt=function(){var e,t,n,0,=
[];function i(n){pt.bindAll(this),n=pt.isString(n)?url:n,n=t|new gt,e=pt.isNumber(n.maxParallelRequests)?
1,maxParallelRequests:e|6,this.url=n.url,this.wildcard=n.wildcard|"%QUERY",this.filter=n.filter,this.replace=n.replace,this.ajaxSettings=
{type:"get",cache:n.cache,timeout:n.timeout,dataType:n.dataType|"json",beforeSend:n.beforeSend,this._get=(!/throttle/i.test(n.rateLimitfn)?pt.throttle:pt.debounce)
(this._get,n.rateLimit|1000)}return pt.mixin(i.prototype,{_get:function(e,n){var r=this;function i(i){var o=r.filter(i);i=i|n&&(o,t.set(e,i))o()}
this._sendRequest(e).done(i):this.onDeckRequestArgs=[]}.slice.call(arguments,0)},_sendRequest:function(e){var t=this,i=r[e];return i|
n+=i,r[e]=c.a.ajax(e,this.ajaxSettings).always((function(){void n--,r[e]=null,t.onDeckRequestArgs&&
(t._get.apply(t,t.onDeckRequestArgs),t.onDeckRequestArgs=null)})),i},get:function(e,n){var r,i,o=this,a=encodeURIComponent(e|""),return n=n|pt.noop,r=this.replace?
this.replace(this.url,a):this.url.replace(this.wildcard,a),i=t._get(r),pt.defer(function(){(o.filter?o.filter(i):i)}):this._get(r,n,!i)}},i;function o(){return n<e}}
(),bt=function(){var e="thumbprint",t="protocol",n="itemHash",r="adjacencyList";function i(e){pt.bindAll(this).pt.isString(e.template)&&e.engine&&c.a.error("no template engine
specified")}a locally accessible variable a scope of local namespace, as per the

```

(E.g., $id.$).

```

({})),!0}catch(e){return!1}var ve=function(e){W()(r,e);var t,n=(t=r,function(){var e,n=X()(t);if(ge()){var r=X()(this).constructor;e=Reflect.construct(n,arguments,r)}else e=n.apply(this,arguments);return $(t)(this,e)});function r(){var e;U()(this,r);for(var t=arguments.length,o=new Array(t),i=0;i<t;i++)o[i]=arguments[i];return e=n.call.apply[
this].concat(o),l()(H)(e),"REGION_IDS",{CURRENT_LOCATION:-1,ALL_LOCATIONS:0}),l()(H)(e),"state",{errorMessage:""}),l()(H)(e),"changeRegion",(function(t){
window.trackLocationFabAnalytics("Select"),t===e.REGION_IDS.CURRENT_LOCATION?(e.setState({isLoadingNewRegion:!0}),window.navigator.geolocation?
window.navigator.geolocation.getCurrentPosition(e.applyCurrentLocation,e.onRegionError):e.onRegionError()):re.a.get("/Region.action",{params:{region.id:t},headers:
{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then((function(n){var
r=n.data,e.applyRegionChange(t,Number(r.secondaryId),Number(r.tertiaryId)))).catch((function(t){p(t,{message:"Error getting
region"}),e.onRegionError()})),window.Vivid.Analytics.fireInteractionAnalyticsEvent({eventCategory:"LocationSelectionUse",eventAction:"SubCategoryPageLocationDropdown",even
ing()})),l()(H)(e),"applyCurrentLocation",(function(t){var n=t.coords.latitude,r=t.coords.longitude;re.a.get("/Region.action?applyGeoLocation",{params:
{latitude:n,longitude:r},headers:{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then((function(t){var n=t.data,r=n.id,o=void 0===r?

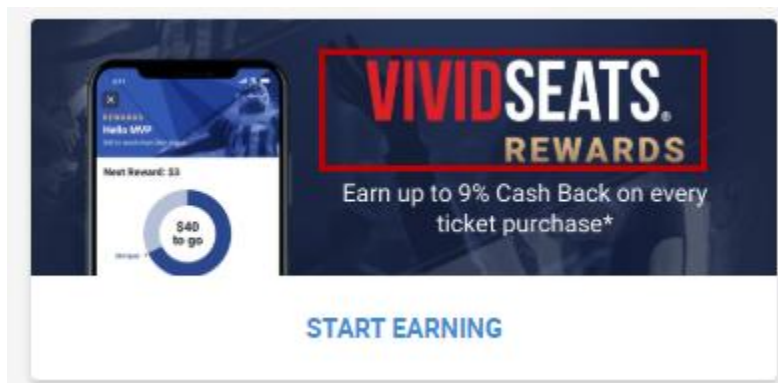
```

(*E.g., id.*).

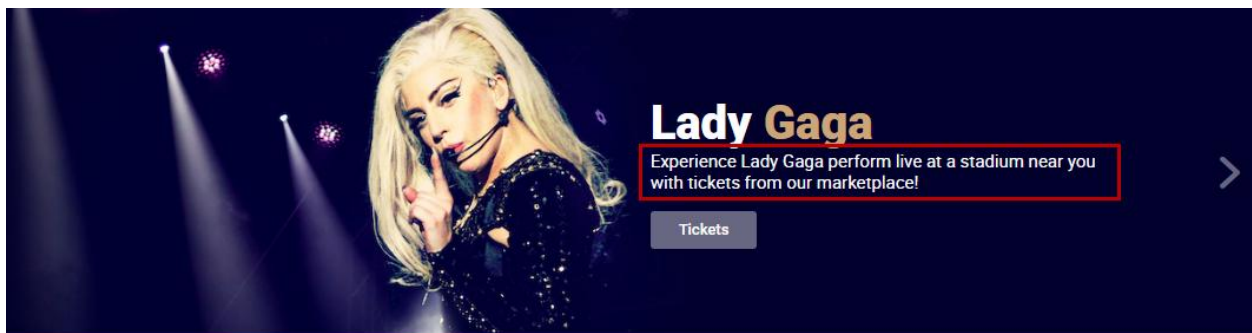
32. The Accused Instrumentality performs the step of receiving an advertisement selected in accordance to the user demographic information (*e.g.*, Vividseats.com provides advertisements to a user based on demographic information such as location, etc.). (*E.g.*, <https://www.vividseats.com/privacy.html>). For example, the Accused Instrumentality has targeted advertising to users based on a user's geography and interest. (*Id.*).

33. The Accused Instrumentality performs the step of executing the template program (*e.g.*, JavaScript templates) using the selected advertisement (*e.g.*, an advertisement selected based on a user's demographic information) to generate the customized page (*e.g.*, a user's Vividseats.com page, with the advertisement integrated).

34. The Accused Instrumentality performs the step of providing the customized page to the user (*e.g.*, a user's Vividseats.com page with integrated advertisements)



(*E.g.*, <https://www.vividseats.com/> (for a particular user)).



(E.g., <https://www.vividseats.com/> (for a particular user)).

35. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '854 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

36. On information and belief, Defendant has had at least constructive notice of the '854 patent by operation of law, and there are no marking requirements that have not been complied with.

IV. COUNT II
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 5,983,227)

37. Plaintiff incorporates the above paragraphs herein by reference.

38. On November 9, 1999, United States Patent No. 5,983,227 ("the '227 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '227 Patent is titled "Dynamic Page Generator." A true and correct copy of the '227 Patent is attached hereto as Exhibit B and incorporated herein by reference.

39. Digi Portal is the assignee of all right, title and interest in the '227 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '227 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '227 Patent by Defendant.

40. The application leading to the '227 patent was filed June 12, 1997. (Ex. B at cover). The '227 patent was first assigned to Yahoo! Inc. (*Id.*).

41. The invention in the ‘227 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:14-18).

42. The ‘227 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, as show in the prosecution history of the ‘227 Patent, it was unconventional to download real-time information into a server and use a template for the static data as opposed to linking directly to real-time information. (Ex. E at 5, Ex. F at 2).

43. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 2 of the ‘227 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method of providing real-time responses to user requests for customized pages, including without limitation through the method implemented of providing a user’s Vividseats.com page (“Accused Instrumentality”). (*E.g.*, <https://www.vividseats.com/Login.action>; <https://www.vividseats.com/>).

44. The Accused Instrumentality performs the step of obtaining user preferences (e.g., location events, etc.), wherein a user's user preferences indicate items of interest to that user. For example, users can customize their location on their Vividseats.com page to locate events near their location:

The screenshot shows the Vividseats website interface. At the top, there is a red navigation bar with the text "FIND YOUR SEATS" on the left, a search bar in the center with the placeholder "Search by team, artist, event or venue", and a location dropdown menu on the right set to "Arizona". Below the navigation bar, the page is divided into three main columns. The left column, titled "TRENDING EVENTS", lists four events: Luke Bryan, Garth Brooks, The Weeknd, and Lady Gaga, each with a small image and a brief description. The middle column, titled "COMING UP NEAR YOU", lists three events: Jason Bonhams Led Zeppelin E..., Arizona Diamondbacks, and COIN, each with a date, time, and venue. The right column, titled "EXPERIENCE VIVID SEATS", lists three items: Full Peace of Mind, Vivid Seats App for iOS and Android, and Exclusive Offers. At the bottom of each column are links: "PREV" and "NEXT" for the trending events, "VIEW MORE" for the coming up events, and "ABOUT US" for the experience section.

(<https://www.vividseats.com/> (for a particular user)).

The screenshot shows the Vividseats website interface with a search filter applied. On the left, there is a "FILTER RESULTS" sidebar with options for "BY DATE" (Choose Dates, This Weekend, Next Weekend, This Month, Next Month) and "BY DAYS" (Weekdays, Weekends). Below these are "BY VENUE" options, including "Baltimore SoundStage". The main content area is titled "Events Near Arizona" and lists three events: "COIN (Rescheduled from 4/6)" on Mon JUN 15 at 8:00 PM at The Van Buren - Phoenix, AZ; "COIN (Rescheduled from 3/28)" on Sat MAY 30 at 7:00 PM at Express Live - Columbus, OH; and "COIN (Rescheduled from 3/27)" on Mon JUN 01 at 7:00 PM at House of Blues Cleveland - Cleveland, OH. Below these is a section titled "EVENTS IN ALL LOCATIONS" which lists "COIN (Rescheduled from 3/15)" on Wed JUN 03 at 8:00 PM at The Fillmore Charlotte - Charlotte, NC.

(<https://www.vividseats.com/Search.action?searchTerm=COIN> (for a particular user)).

45. On information and belief, the Accused Instrumentality performs obtaining real-time information (*e.g.*, current events) from information sources (*e.g.*, Vividseats.com's servers/databases which store real-time event information) and storing the real-time information in a storage device (*e.g.*, the events will be pulled from a storage server and sent to Vividseats.com's web/API server so that the information can be used as input in a template program to generate a customized page that is provided to a user).

FIND YOUR SEATS **Arizona**

TRENDING EVENTS

Luke Bryan
Catch country heartthrob, Luke Bryan, with ti...

Garth Brooks
Don't miss this Country Music Hall of Famer ...

The Weeknd
Don't miss your chance to see The Weeknd ...

Lady Gaga
Experience Lady Gaga perform live at a stadi...

[PREV](#) [NEXT](#)

COMING UP NEAR YOU

Tue
MAY 26
7:30PM
Jason Bonhams Led Zeppelin E...
Celebrity Theatre - Phoenix, AZ

JUN
2020
Arizona Diamondbacks
Chase Field - Phoenix, AZ

Mon
JUN 15
8:00PM
COIN
The Van Buren - Phoenix, AZ

Tue
JUN 16
8:00PM
Peach Pit
Crescent Ballroom - Phoenix - Phoenix, AZ

[VIEW MORE](#)

EXPERIENCE VIVID SEATS

Full Peace of Mind
Industry leading safety and security since 2001

Vivid Seats App for iOS and Android
Exclusive deals, fast mobile entry and more!

Exclusive Offers
Sign up for discounts, event alerts, and more!

As seen on ESPN!
Watch our ads and Find Your Seats!

[ABOUT US](#)

(<https://www.vividseats.com/> (for a particular user)).

FILTER RESULTS

BY DATE
Choose Dates
This Weekend
Next Weekend
This Month
Next Month

BY DAYS
Weekdays
Weekends

BY VENUE
Baltimore SoundStage

Events Near Arizona

Mon
JUN 15
8:00 PM
COIN (Rescheduled from 4/6)
The Van Buren - Phoenix, AZ

EVENTS IN ALL LOCATIONS

Sat
MAY 30
7:00 PM
COIN (Rescheduled from 3/28)
Express Live - Columbus, OH

Mon
JUN 01
7:00 PM
COIN (Rescheduled from 3/27)
House of Blues Cleveland - Cleveland, OH

Wed
JUN 03
8:00 PM
COIN (Rescheduled from 3/15)
The Fillmore Charlotte - Charlotte, NC

(<https://www.vividseats.com/Search.action?searchTerm=COIN> (for a particular user)).

```

</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-r" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;"></div>
    <div id="siteHeader" class="site-header">
      <div class="vdp-container site-header__container"></div>
      <div id="mobileNavBackdrop" class="vdp-backdrop dn-min-t" data-for="siteHeaderNav"></div>
    </div>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel" class="carousel"></div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg"></div>
    <main class="vdp-container mb-3xl">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header"></div> == $0
          <div class="regionalImageGrid"></div>
          <div class="vdp-card__footer--centered"></div>
        </div>
        <div id="trendingEvents" class="vdp-card--list"></div>
        <div id="aboutLinks" class="vdp-card--list">
          <div class="vdp-card__header"></div>
          <a href="/is-vivid-seats-legitimate-and-reliable.html" class="vdp-event-row"></a>
          <a href="/vivid-seats-app.html" class="vdp-event-row"></a>
          <a class="vdp-event-row" onclick="vdpModal('open', 'newsletterModal')"></a>
          <a href="https://www.vividseats.com/blog/vivid-seats-debuts-inaugural-national-advertising-campaign" class="vdp-event-row"></a>
          <div class="vdp-card__footer--centered"></div>
        </div>
        <div class="vdp-card"></div>
        <div class="vdp-card"></div>
      </div>
    </main>
  </div>
</body>

```

General template
used to generate
webpage

(<https://www.vividseats.com/> (for a particular user)).

46. On information and belief, the Accused Instrumentality performs the step of combining the user preferences for the user (*e.g.*, the search terms input by a user such as preferences set by user for event searches) and a template (*e.g.*, generic template) to form a template program specific to the user (*e.g.*, the code for the entire webpage that utilizes a generic template and user's inputted search terms to create a webpage that is customized to display a user's search results).

(<https://www.vividseats.com/Search.action?searchTerm=COIN> (for a particular user)).

47. As shown below, Vividseats.com will then combine the template with customized data pulled based upon a user's search inputs in order to create a template program executable by a user's browser, so that the customized webpage can be displayed to the user.

```

</header>
<div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
<script type="application/json">_</script>
<script type="text/javascript">_</script>
<script type="text/javascript">_</script>
<div class="vdp-page-hero--fade

--tabbed ">_</div>
<link href="//a.vstatic.com/web/a1a342f_/brandEnforcement/brandEnforcement.css" rel="stylesheet">
<main class="vdp-container vdp-main-content">
  <div class="vdp-row">
    <section class="vdp-col--sm-12--md-8">
      <div id="productionsContainer">
        <div class="productions widget" id="widget_498b8408-ffdb-49de-bf69-b7e5b8cf3e9e">
          <script>_</script>
          <div id="reactProductionsListContainer">
            <div class="vdp-card--list" id="localEventsCard">
              <div class="vdp-fab " data-state="visible">_</div>
              <div class="vdp-card__header dn-min-t">_</div>
              <div class="vdp-card__body p-n">
                <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                  <div class="vdp-event-row__col--date">
                    <meta itemprop="startDate" title="1592231400" content="2020-06-15">
                    <meta itemprop="endDate" title="1592231400" content="2020-06-15">
                    <p class="vdp-type-small --muted --center">Mon</p>
                    <p class="vdp-type-body2 --blk --compressed --center --uppercase">Jun 15</p> == $0
                  <p class="vdp-type-small --muted --center">8:00 PM</p>
                </div>
              </div>
            </div>
          </div>
        </div>
      </section>
    </div>
  </div>

```

General template used to generate webpage after inputting particular search event by a user

(<https://www.vividseats.com/concerts/coin-tickets.html> (for a particular user)).


```

<head>...</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-r" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;"></div>
    <header id="siteHeader" class="site-header">...</header>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel" class="carousel">...</div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg">...</div>
    <main class="vdp-container mb-3xl">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header">...</div>
          <div class="regionalImageGrid">
            <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class
itemscope itemtype="http://schema.org/Event">
...
          <div class="vdp-event-row">...</div> == $0
          <div itemprop="location" itemscope itemtype="http://schema.org/Place">...</div>
          <meta itemprop="description" content="Ticket listings for Jason Bonhams Led Zeppelin E...">
          <meta itemprop="image" content="/v4/images/event/generic/rock.jpg">
          <meta itemprop="endDate" content="2020-05-26">
          </a>
          <a href="/mlb-baseball/arizona-diamondbacks-tickets.html" class itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" class itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/peach-pit-tickets/peach-pit-crescent-ballroom-phoenix-6-16-3418742.html" class itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/chicago-tickets/chicago-akchin-pavilion-6-20-3358437.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/theatre/iliiza-shlesinger-tickets/iliiza-shlesinger-3-21-3334962.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/trixie-mattel-tickets/trixie-mattel-oroheum-theatre-phoenix-3-13-3309336.html" class=" dn-min-t" itemscope itemtype="http://
schema.org/Event">...</a>
          <a href="/concerts/lane-8-tickets/lane-8-the-van-buren-3-14-3272819.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
        </div>
      </div>
    </main>
  </div>
</body>

```

Content obtained from
information sources
combined with template

(<https://www.vividseats.com/> (for a particular user)).

48. On information and belief, the Accused Instrumentality performs the step of receiving, from a user and at the server, a user request for a customized page (e.g., a user will request a webpage that displays available events meeting the parameters they inputted; this request will be received at the Vividseats.com web server) customized according to the user preferences. The following screenshots are examples of the request for a customized page that is customized according to the user preferences:

Location
 Arizona

☐ Current Location

☐ All Locations

☐ AK – Alaska

☐ AL – Alabama

☐ AR – Arkansas

☒ AZ – Arizona

☐ CA – Bay Area

☐ CA – Fresno

DISMISS

(<https://www.vividseats.com/> (for a particular user)).

FIND YOUR SEATS

Arizona

TRENDING EVENTS

Luke Bryan
 Catch country heartthrob, Luke Bryan, with ti...

Garth Brooks
 Don't miss this Country Music Hall of Famer ...

The Weeknd
 Don't miss your chance to see The Weeknd ...

Lady Gaga
 Experience Lady Gaga perform live at a stadi...

PREV
NEXT

COMING UP NEAR YOU

Tue
MAY 26
 7:30PM

Jason Bonhams Led Zeppelin E...
 Celebrity Theatre - Phoenix, AZ

JUN
 2020

Arizona Diamondbacks
 Chase Field - Phoenix, AZ

Mon
JUN 15
 8:00PM

COIN
 The Van Buren - Phoenix, AZ

Tue
JUN 16
 8:00PM

Peach Pit
 Crescent Ballroom - Phoenix - Phoenix, AZ

VIEW MORE

EXPERIENCE VIVID SEATS

Full Peace of Mind

Industry leading safety and security since 2001

Vivid Seats App for iOS and Android

Exclusive deals, fast mobile entry and more!

Exclusive Offers

Sign up for discounts, event alerts, and more!

As seen on ESPN!

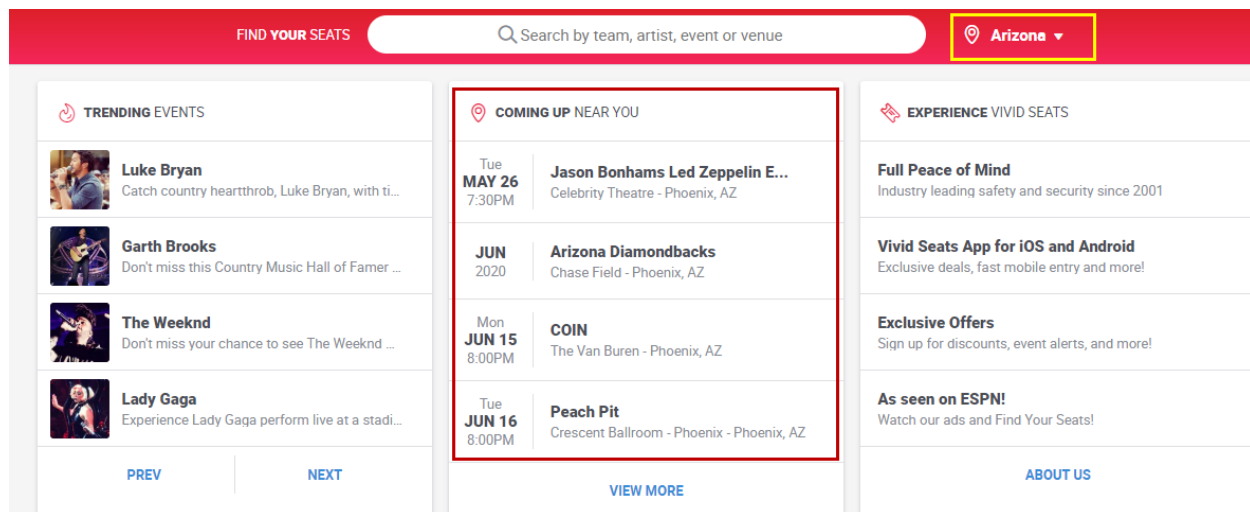
Watch our ads and Find Your Seats!

ABOUT US

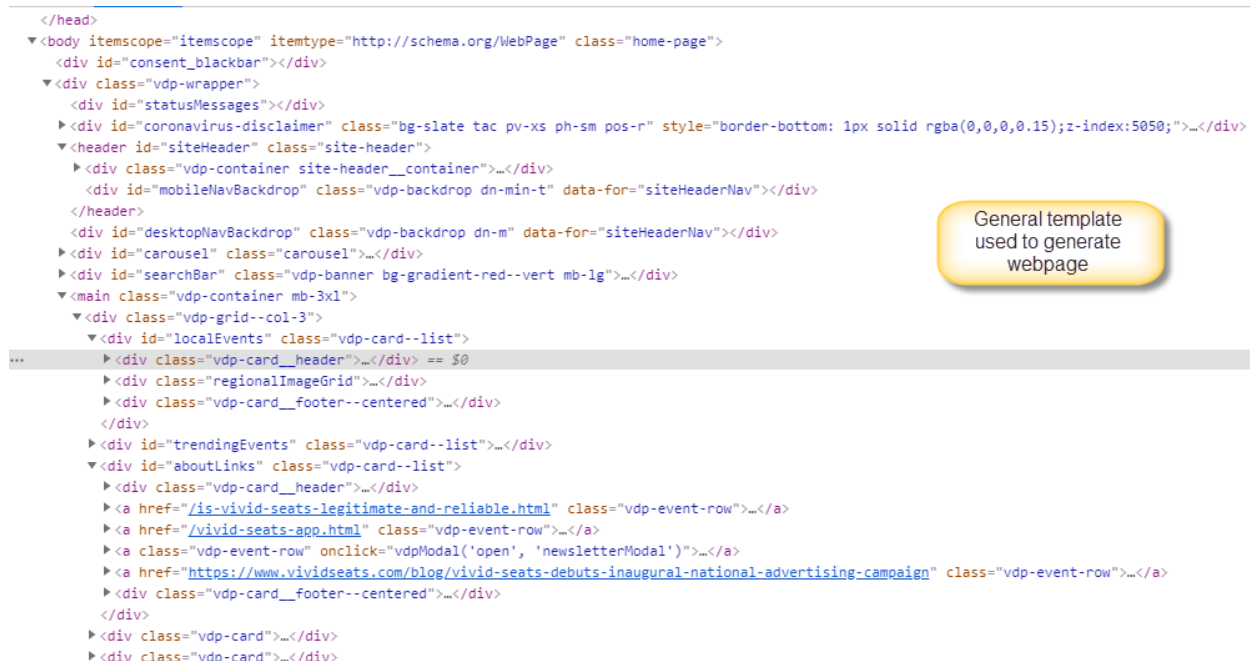
(<https://www.vividseats.com/> (for a particular user)).

49. The Accused Instrumentality performs the step of executing the template program (e.g., the code for the website which includes code representing a generic template that defines the general layout of the webpage, and other pieces of real-time information, such as available currently available events information, gathered from information source using various APIs and

scripts) specific to the user (e.g., the webpage is catered towards the user's search queries) using the real-time information stored in the storage device (e.g., event information will be gathered from information source using an API and/or scripts, and stored, at least temporarily, on a local web/API server web server) as input to the template program to generate the customized page (e.g., the event information gathered will be combined with a generic layout template to create the entire webpage).



(<https://www.vividseats.com/> (for a particular user)).



(<https://www.vividseats.com/> (for a particular user)).

```

</header>
<div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
<script type="application/ld+json">_</script>
<script type="text/javascript">_</script>
<script type="text/javascript">_</script>
<div class="vdp-page-hero--fade

--tabbed ">_</div>
<link href="//a.vstatic.com/web/ala342f_/brandEnforcement/brandEnforcement.css" rel="stylesheet">
<main class="vdp-container vdp-main-content">
  <div class="vdp-row">
    <section class="vdp-col--sm-12--md-8">
      <div id="productionsContainer">
        <div class="productions widget" id="widget_498b8408-ffdb-49de-bf69-b7e5b8cf3e9e">
          <script>_</script>
          <div id="reactProductionsListContainer">
            <div class="vdp-card--list" id="localEventsCard">
              <div class="vdp-fab " data-state="visible">_</div>
              <div class="vdp-card__header dn-min-t">_</div>
              <div class="vdp-card__body p-n">
                <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                  <div class="vdp-event-row__col--date">
                    <meta itemprop="startDate" title="1592231400" content="2020-06-15">
                    <meta itemprop="endDate" title="1592231400" content="2020-06-15">
                    <p class="vdp-type-small --muted --center">Mon</p>
                    <p class="vdp-type-body2 --blk --compressed --center --uppercase">Jun 15</p> == $0
                  <div class="vdp-type-small --muted --center">9:00 PM / 1h

```

General template used to generate webpage after inputting particular search event by a user

(<https://www.vividseats.com/> (for a particular user)).

50. The Accused Instrumentality performs the step of providing the customized page to the user (*e.g.*, a webpage showing events that meet a user's search requirements) wherein the steps of executing and providing are performed in real-time response to receipt of the user request in the step of receiving (*e.g.*, the webpage of events is requested in real-time as the user request it and wherein the customized page includes at least one item of real-time information (*e.g.*, current event listings) selected from the storage device (*e.g.*, current event information).

Location
 Arizona

☐ Current Location

☐ All Locations

☐ AK – Alaska

☐ AL – Alabama

☐ AR – Arkansas

☒ AZ – Arizona

☐ CA – Bay Area

☐ CA – Fresno

DISMISS

(<https://www.vividseats.com/> (for a particular user)).

FIND YOUR SEATS

Arizona ▼

TRENDING EVENTS

Luke Bryan
Catch country heartthrob, Luke Bryan, with ti...

Garth Brooks
Don't miss this Country Music Hall of Famer ...

The Weeknd
Don't miss your chance to see The Weeknd ...

Lady Gaga
Experience Lady Gaga perform live at a stadi...

PREV
NEXT

COMING UP NEAR YOU

Tue
MAY 26
7:30PM

Jason Bonhams Led Zeppelin E...
Celebrity Theatre - Phoenix, AZ

JUN
2020

Arizona Diamondbacks
Chase Field - Phoenix, AZ

Mon
JUN 15
8:00PM

COIN
The Van Buren - Phoenix, AZ

Tue
JUN 16
8:00PM

Peach Pit
Crescent Ballroom - Phoenix - Phoenix, AZ

VIEW MORE

EXPERIENCE VIVID SEATS

Full Peace of Mind
Industry leading safety and security since 2001

Vivid Seats App for iOS and Android
Exclusive deals, fast mobile entry and more!

Exclusive Offers
Sign up for discounts, event alerts, and more!

As seen on ESPN!
Watch our ads and Find Your Seats!

ABOUT US

(<https://www.vividseats.com/> (for a particular user)).

51. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '227 patent, *i.e.*, in an amount that by law

cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

52. On information and belief, Defendant has had at least constructive notice of the ‘227 patent by operation of law, and there are no marking requirements that have not been complied with.

V. COUNT III
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,171,414)

53. Plaintiff incorporates the above paragraphs herein by reference.

54. On January 30, 2007, United States Patent No. 7,171,414 (“the ‘414 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘414 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘414 Patent is attached hereto as Exhibit G and incorporated herein by reference.

55. Digi Portal is the assignee of all right, title and interest in the ‘414 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘414 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘414 Patent by Defendant.

56. The application leading to the ‘414 patent was filed September 10, 1999, which was a continuation of application no. 08/873,975, which issued as the ‘227 patent. (Ex. G at cover). The ‘414 patent was first assigned to Yahoo! Inc. (*Id.*).

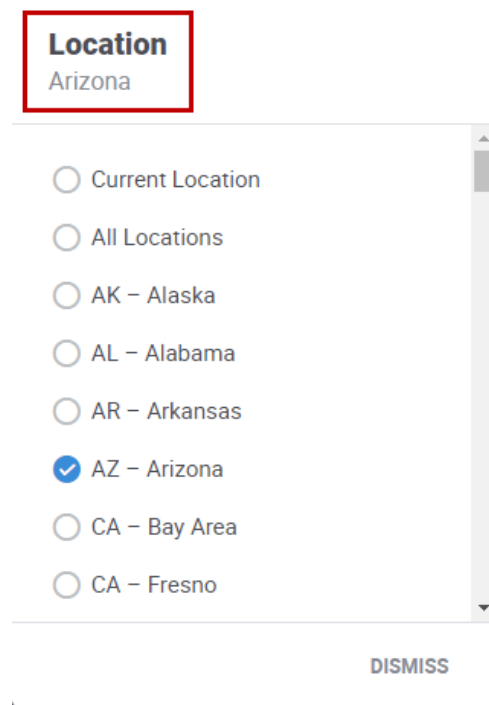
57. The invention in the ‘414 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:29-33).

58. The '414 Patent shares the identical specification as the '854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the '414 patent highlights advantages and unconventional features of the claimed invention including the "storing real-time information in a shared local storage device." An example of this limitation is when live data used to fill templates is stored local to the page server which is handling user requests for custom web pages. (Ex. I at 8; Ex. G at col. 2:11-15). Every piece of information that a person can request on a page is storable in a shared memory closely coupled to a page generator. (Ex. I at 9; Ex. G at col. 4:43-58). Unlike the prior art CGI process that required time consuming calls to other servers, storing real-time information in a shared local storage device, allows for any custom page to be built within the page server thereby eliminating the need to make requests from other servers for portions of the live data. (Ex. I at 9; Ex. G at col. 2:25-31).

59. Furthermore, as show in the prosecution history of the '414 Patent, it was unconventional to receive the template program from one of at least two location, the frequency of the user request for the customized page determines the retrieval location of the template program. (Ex. H at 9-10). In the prior art, the published web site was stored on a server and provided from one server location regardless of the frequency of the user requests for the web site. (*Id.*). The examiner agreed that the claim was allowable because the prior art did not disclose that in a page server coupled to a network a method of providing a customized page to a user, the customized page is customized according to the user's preferences, and the template is received from one of at least two locations, the location determined from frequency of the user request for the customized page. (Ex. J at 3).

60. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 3 of the '414 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method using the Vividseats.com website ("Accused Instrumentality"). The Accused Instrumentality uses a page server (*e.g.*, the Vividseats.com server), to provide a customized page (*e.g.*, user-specific web page, search results, etc.) to a user, wherein the customized page is customized according to the user's preferences (*e.g.*, user location, events, etc.).

61. On information and belief, the Accused Instrumentality performs the step of obtaining real-time information from information sources (*e.g.*, an API is used to gather real-time event information for information source) and stores them in a shared local storage device (*e.g.*, event information will be gathered from information source using an API and/or scripts, and stored, at least temporarily, on a local web/API server web server).

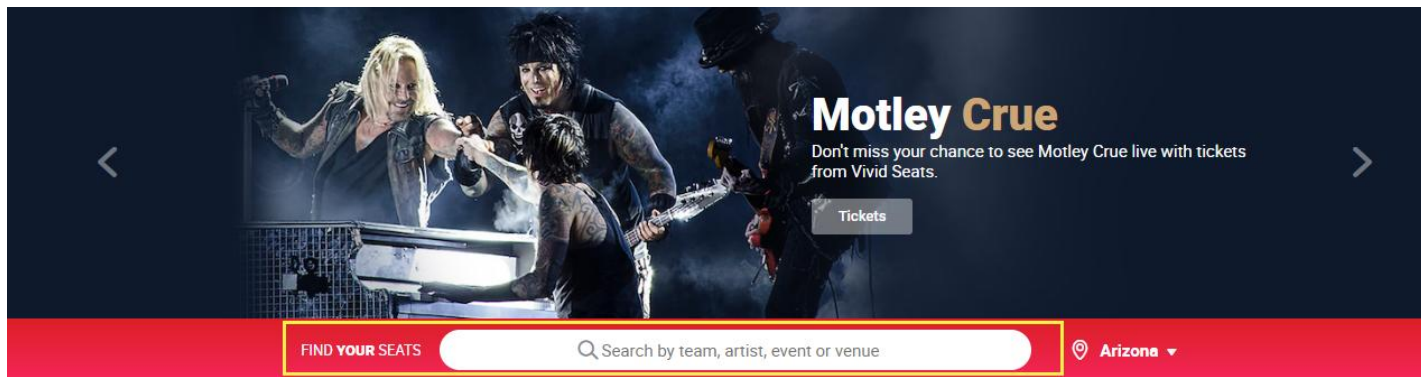


Location
Arizona

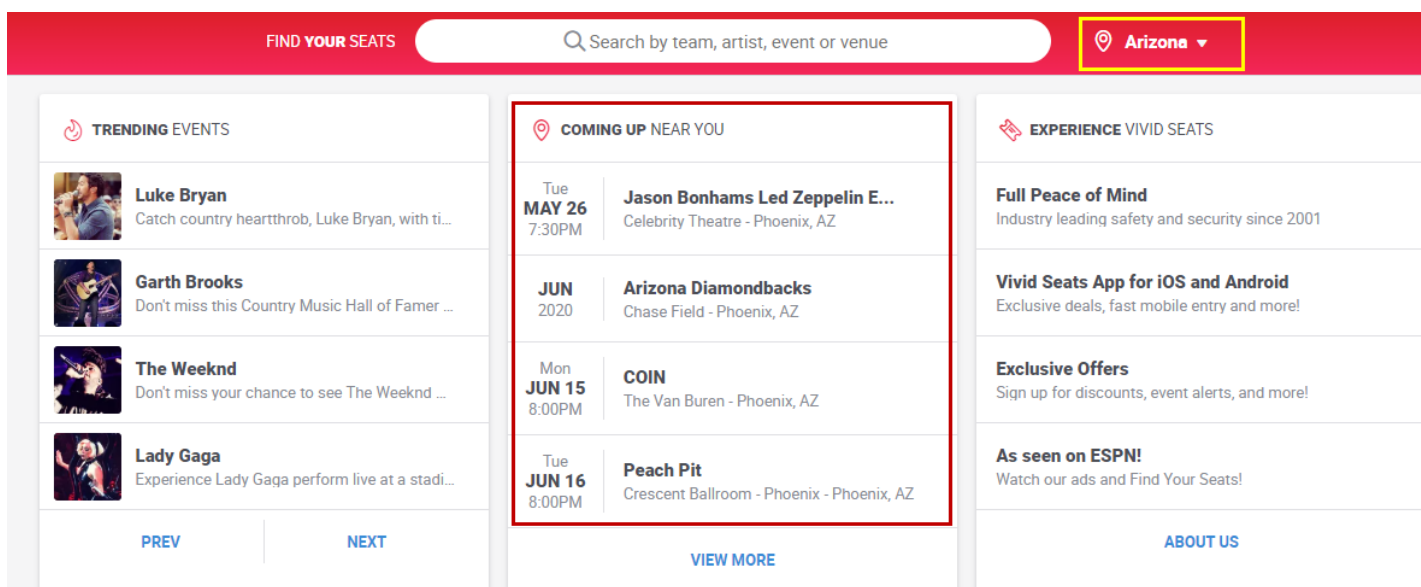
- ☐ Current Location
- ☐ All Locations
- ☐ AK - Alaska
- ☐ AL - Alabama
- ☐ AR - Arkansas
- ☒ AZ - Arizona
- ☐ CA - Bay Area
- ☐ CA - Fresno

DISMISS

(<https://www.vividseats.com/> (for particular user)).



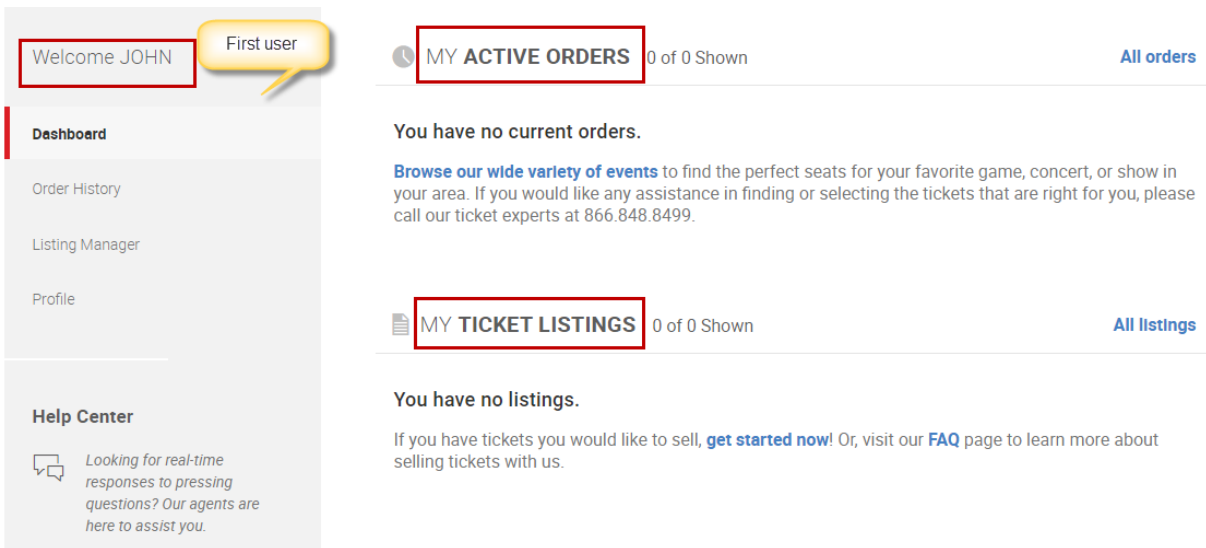
(<https://www.vividseats.com/> (for particular user)).



(<https://www.vividseats.com/> (for particular user)).

62. On information and belief, the Accused Instrumentality performs the step of storing a user-specific template program (*e.g.*, generic template customized to a user-specific template program based on user-specific interests & with real-time information) for the user in a data structure associated with a user identifier unique to the user (*e.g.*, a template program will be created for a user's particular search so that the template program can be executed as to display the user's search results as a webpage; the template program is assigned an identifying number so it can be tied to a particular user's search query; the template program will be stored, at least temporarily on a Vividseats.com server). The accused instrumentality uses the template

program that is unique to the user which is generated using customization information unique to the user and a global template that is generic to a plurality of users. As shown below, after a user logs in, Vividseats.com display active orders that has been previously saved by user. As such, a user-specific template program utilized to create the displayed webpage that show a user's saved orders, ticket listings, wherein said template program is tied to a user's log in information/account.



(<https://www.vividseats.com/account/Account.action> (for a particular user)).

63. Upon information and belief, the Accused Instrumentality performs the step of receiving, from the user and at the page server (*e.g.*, Vividseats.com server), a user request (*e.g.*, user login, search initiation, etc.) for a customized page (*e.g.*, the Vividseats.com server receives a user's request for event information meeting their inputted parameters) and determining a user identifier associated with the request (*e.g.*, the Vividseats.com server assigns an identifying number to the user's search). As shown below, after a user logs in, Vividseats.com can display active orders saved by the user. As such, a user-specific template program utilized to create the displayed webpage that show a user's saved orders, ticket listings, wherein said template program is tied to a user's log in information/account.

Welcome JOHN First user

Dashboard

- Order History
- Listing Manager
- Profile

Help Center

Looking for real-time responses to pressing questions? Our agents are here to assist you.

MY ACTIVE ORDERS 0 of 0 Shown [All orders](#)

You have no current orders.

[Browse our wide variety of events](#) to find the perfect seats for your favorite game, concert, or show in your area. If you would like any assistance in finding or selecting the tickets that are right for you, please call our ticket experts at 866.848.8499.

MY TICKET LISTINGS 0 of 0 Shown [All listings](#)

You have no listings.

If you have tickets you would like to sell, [get started now!](#) Or, visit our [FAQ](#) page to learn more about selling tickets with us.

(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).

Welcome ROBERT Second user

Dashboard

- Order History
- Listing Manager
- Profile

Help Center

Looking for real-time responses to pressing questions? Our agents are here to assist you.

[Contact us](#)

MY ACTIVE ORDERS 0 of 0 Shown [All orders](#)

You have no current orders.

[Browse our wide variety of events](#) to find the perfect seats for your favorite game, concert, or show in your area. If you would like any assistance in finding or selecting the tickets that are right for you, please call our ticket experts at 866.848.8499.

MY TICKET LISTINGS 0 of 0 Shown [All listings](#)

You have no listings.

If you have tickets you would like to sell, [get started now!](#) Or, visit our [FAQ](#) page to learn more about selling tickets with us.

(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).

64. On information and belief, the Accused Instrumentality performs the step of receiving a template program specific to the user using the determined user identifier associated with the user request (e.g., the Vividseats.com server will receive a template program, which is the code and data that represents the search results webpage to be delivered to a user, that is identified by a number and linked to a user and their search query). The accused instrumentality

uses the template program that is unique to the user which is generated using customization information unique to the user and a global template that is generic to a plurality of users. As shown below, after a user logs in, Vividseats.com can display active orders that has been previously saved by user. As such, a user-specific template program utilized to create the displayed webpage that show a user's saved orders, ticket listings, wherein said template program is tied to a user's log in information/account

The screenshot shows the user account dashboard for a first user named JOHN. The left sidebar contains a 'Welcome JOHN' message, a 'First user' callout, and a 'Dashboard' section with links to 'Order History', 'Listing Manager', and 'Profile'. Below this is a 'Help Center' section with a chat icon and text: 'Looking for real-time responses to pressing questions? Our agents are here to assist you.' The main content area displays 'MY ACTIVE ORDERS' (0 of 0 Shown) with a link to 'All orders'. Below this, it states 'You have no current orders.' and provides a link to 'Browse our wide variety of events'. Further down, it shows 'MY TICKET LISTINGS' (0 of 0 Shown) with a link to 'All listings', followed by the text 'You have no listings.' and a link to 'get started now!'.

(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).

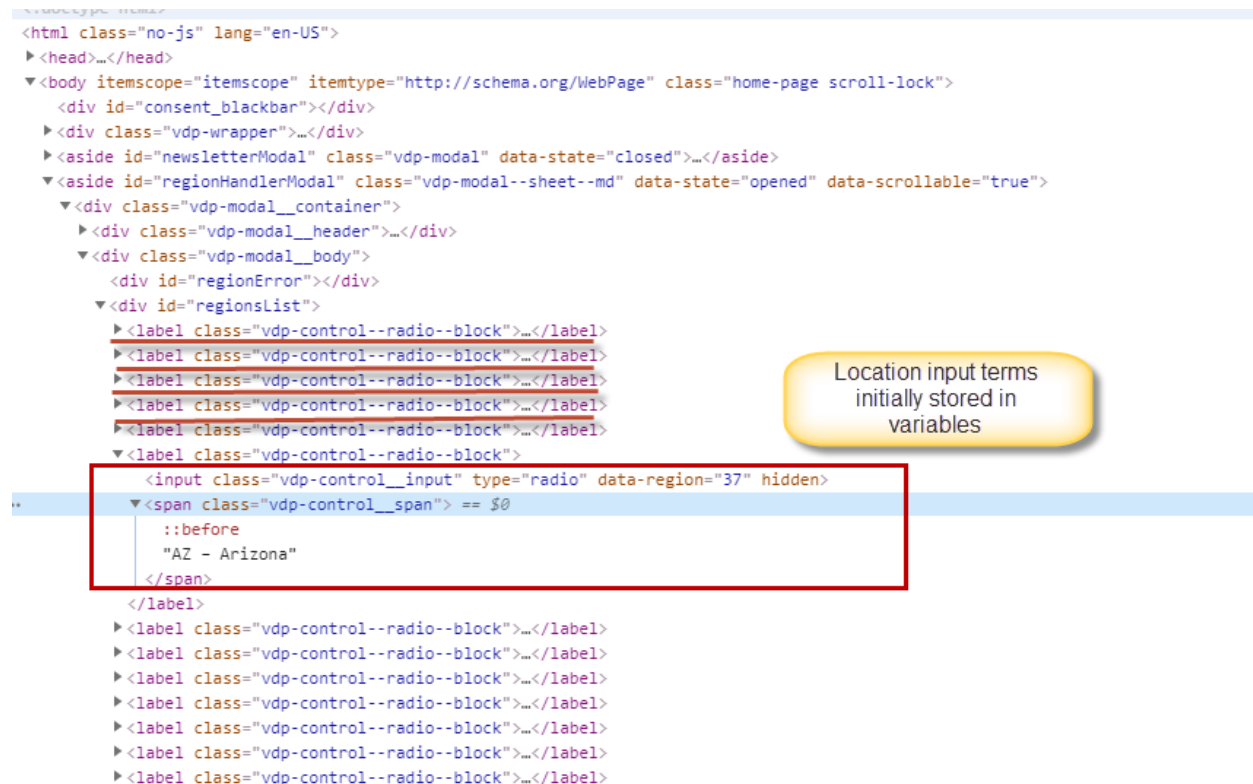
The screenshot shows the user account dashboard for a second user named ROBERT. The left sidebar contains a 'Welcome ROBERT' message, a 'Second user' callout, and a 'Dashboard' section with links to 'Order History', 'Listing Manager', and 'Profile'. Below this is a 'Help Center' section with a chat icon and text: 'Looking for real-time responses to pressing questions? Our agents are here to assist you.' and a 'Contact us' link. The main content area displays 'MY ACTIVE ORDERS' (0 of 0 Shown) with a link to 'All orders'. Below this, it states 'You have no current orders.' and provides a link to 'Browse our wide variety of events'. Further down, it shows 'MY TICKET LISTINGS' (0 of 0 Shown) with a link to 'All listings', followed by the text 'You have no listings.' and a link to 'get started now!'.

(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).

65. On information and belief, the Accused Instrumentality performs the step that the template program is received from one of at least two locations, the location determined from frequency of the user request for the customized page (e.g., the code and objects making up a webpage delivered to the user may be fetched from a main server or from a user's local cache depending on how often the user inputs a similar search query).

66. In at least testing and usage, the accused instrumentality practices receiving a template program (e.g., software instructions and data used for rendering a particular user's search results page such as a JavaScript page) that is unique to the user (e.g., JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user configuration information (e.g., a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as their requested location) the user configuration information being supplied by the user (e.g., a user defines the information their template will display by inputting information such as their requested location) and used to build the template program that is unique to the user (e.g., user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page) and wherein the template program is received from one of at least two locations (e.g., the data and templates comprising a user's page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized page (e.g., based on the frequency at which a user logs in or accesses the Vividseats.com page, the data comprising the users page may be stored at a main server). Template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in

storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. Webpage information can be stored in a JavaScript object that is used in logic to display various available events and other site logic-based conditions. The template information is stored in multiple locations: (1) At runtime, in a JavaScript object with the data structure called Context Data; (2) Within browser local storage; and (3) browser cookies.



(<https://www.vividseats.com/> (for a particular user)).

```
e=!window.Vivid&&!window.Vivid.Analytics&&!window.Vivid.Analytics.getPageMetaDate().Event;if(!e)return{};var t={},n=e.eventSubCategory,r=e.eventName,i=e.eventCategory;if(n){var o=n.split(":");t.event_category=2===o.length?o[1]:n;return r&&(t.event_name=r),i&&(t.event_type=i),t}function j(e,t){var n=void 0===t?e:e+t+".tpl.htm",r=e+"t,i=<h4>Failed to load template:"<hr>";return""===t[r]?":(c.a.ajax({method:"GET",async:1,url:n,dataType:"text",success:function(e){i,e,T[r]=i,error:function(e,t,r){i="<p>"+("Error getting Template:"<hr>"; Text:"<hr>"; Error:"<hr>"+r}</p>"}},i)}function N(e){return"/#/.test(e)?e:e.replace(/./g,"#1")}function D(e,t){var n,r=!1;try{window.localStorage.setItem("vs ls test",123),window.localStorage.removeItem("vs ls test"),r=!0}catch(e){r=!1;if(null!=t)"object"===x(t)&&(t=JSON.stringify(t)),r?window.localStorage.setItem(e,t):i(e,t,30);else if(void 0===t){n=window.localStorage.getItem(e);function e(){for(var t="=",n=document.cookie.split(";"),r=0,i=n.length;r<i;r++){for(var o=n[r];""===o.charAt(0);o=o.substring(1,o.length));if(0===o.indexOf(t))return o.substring(t.length,o.length)}return null}}(e);try{n=JSON.parse(n)}catch(e){n=n}return n}null===t&&(r?window.localStorage.removeItem(e):i(e,"",-1))}function i(e,t,n){var r,i=new Date;i.setTime(i.getTime()+24*n*60*60*1e3),r=""; expires="+i.toGMTString(),document.cookie=e+"="+t+r+";path=/"}function l(){if(!IPhoneOdAd).test(navigator.platform)){var e=navigator.appVersion.match(/OS (\d+)_(\d+)_?/);var t=e[1],n=e[2],r=e[3],i=e[4],o=e[5],a=e[6],s=e[7],u=e[8],l=e[9],c=e[10],f=e[11],m=e[12],v=e[13],p=e[14],d=e[15],g=e[16],h=e[17],b=e[18],k=e[19],j=e[20],i=e[21],o=e[22],n=e[23],r=e[24],t=e[25],a=e[26],s=e[27],u=e[28],l=e[29],c=e[30],f=e[31],m=e[32],v=e[33],p=e[34],d=e[35],g=e[36],h=e[37],b=e[38],k=e[39],j=e[40],i=e[41],o=e[42],n=e[43],r=e[44],t=e[45],a=e[46],s=e[47],u=e[48],l=e[49],c=e[50],f=e[51],m=e[52],v=e[53],p=e[54],d=e[55],g=e[56],h=e[57],b=e[58],k=e[59],j=e[60],i=e[61],o=e[62],n=e[63],r=e[64],t=e[65],a=e[66],s=e[67],u=e[68],l=e[69],c=e[70],f=e[71],m=e[72],v=e[73],p=e[74],d=e[75],g=e[76],h=e[77],b=e[78],k=e[79],j=e[80],i=e[81],o=e[82],n=e[83],r=e[84],t=e[85],a=e[86],s=e[87],u=e[88],l=e[89],c=e[90],f=e[91],m=e[92],v=e[93],p=e[94],d=e[95],g=e[96],h=e[97],b=e[98],k=e[99],j=e[100],i=e[101],o=e[102],n=e[103],r=e[104],t=e[105],a=e[106],s=e[107],u=e[108],l=e[109],c=e[110],f=e[111],m=e[112],v=e[113],p=e[114],d=e[115],g=e[116],h=e[117],b=e[118],k=e[119],j=e[120],i=e[121],o=e[122],n=e[123],r=e[124],t=e[125],a=e[126],s=e[127],u=e[128],l=e[129],c=e[130],f=e[131],m=e[132],v=e[133],p=e[134],d=e[135],g=e[136],h=e[137],b=e[138],k=e[139],j=e[140],i=e[141],o=e[142],n=e[143],r=e[144],t=e[145],a=e[146],s=e[147],u=e[148],l=e[149],c=e[150],f=e[151],m=e[152],v=e[153],p=e[154],d=e[155],g=e[156],h=e[157],b=e[158],k=e[159],j=e[160],i=e[161],o=e[162],n=e[163],r=e[164],t=e[165],a=e[166],s=e[167],u=e[168],l=e[169],c=e[170],f=e[171],m=e[172],v=e[173],p=e[174],d=e[175],g=e[176],h=e[177],b=e[178],k=e[179],j=e[180],i=e[181],o=e[182],n=e[183],r=e[184],t=e[185],a=e[186],s=e[187],u=e[188],l=e[189],c=e[190],f=e[191],m=e[192],v=e[193],p=e[194],d=e[195],g=e[196],h=e[197],b=e[198],k=e[199],j=e[200],i=e[201],o=e[202],n=e[203],r=e[204],t=e[205],a=e[206],s=e[207],u=e[208],l=e[209],c=e[210],f=e[211],m=e[212],v=e[213],p=e[214],d=e[215],g=e[216],h=e[217],b=e[218],k=e[219],j=e[220],i=e[221],o=e[222],n=e[223],r=e[224],t=e[225],a=e[226],s=e[227],u=e[228],l=e[229],c=e[230],f=e[231],m=e[232],v=e[233],p=e[234],d=e[235],g=e[236],h=e[237],b=e[238],k=e[239],j=e[240],i=e[241],o=e[242],n=e[243],r=e[244],t=e[245],a=e[246],s=e[247],u=e[248],l=e[249],c=e[250],f=e[251],m=e[252],v=e[253],p=e[254],d=e[255],g=e[256],h=e[257],b=e[258],k=e[259],j=e[260],i=e[261],o=e[262],n=e[263],r=e[264],t=e[265],a=e[266],s=e[267],u=e[268],l=e[269],c=e[270],f=e[271],m=e[272],v=e[273],p=e[274],d=e[275],g=e[276],h=e[277],b=e[278],k=e[279],j=e[280],i=e[281],o=e[282],n=e[283],r=e[284],t=e[285],a=e[286],s=e[287],u=e[288],l=e[289],c=e[290],f=e[291],m=e[292],v=e[293],p=e[294],d=e[295],g=e[296],h=e[297],b=e[298],k=e[299],j=e[300],i=e[301],o=e[302],n=e[303],r=e[304],t=e[305],a=e[306],s=e[307],u=e[308],l=e[309],c=e[310],f=e[311],m=e[312],v=e[313],p=e[314],d=e[315],g=e[316],h=e[317],b=e[318],k=e[319],j=e[320],i=e[321],o=e[322],n=e[323],r=e[324],t=e[325],a=e[326],s=e[327],u=e[328],l=e[329],c=e[330],f=e[331],m=e[332],v=e[333],p=e[334],d=e[335],g=e[336],h=e[337],b=e[338],k=e[339],j=e[340],i=e[341],o=e[342],n=e[343],r=e[344],t=e[345],a=e[346],s=e[347],u=e[348],l=e[349],c=e[350],f=e[351],m=e[352],v=e[353],p=e[354],d=e[355],g=e[356],h=e[357],b=e[358],k=e[359],j=e[360],i=e[361],o=e[362],n=e[363],r=e[364],t=e[365],a=e[366],s=e[367],u=e[368],l=e[369],c=e[370],f=e[371],m=e[372],v=e[373],p=e[374],d=e[375],g=e[376],h=e[377],b=e[378],k=e[379],j=e[380],i=e[381],o=e[382],n=e[383],r=e[384],t=e[385],a=e[386],s=e[387],u=e[388],l=e[389],c=e[390],f=e[391],m=e[392],v=e[393],p=e[394],d=e[395],g=e[396],h=e[397],b=e[398],k=e[399],j=e[400],i=e[401],o=e[402],n=e[403],r=e[404],t=e[405],a=e[406],s=e[407],u=e[408],l=e[409],c=e[410],f=e[411],m=e[412],v=e[413],p=e[414],d=e[415],g=e[416],h=e[417],b=e[418],k=e[419],j=e[420],i=e[421],o=e[422],n=e[423],r=e[424],t=e[425],a=e[426],s=e[427],u=e[428],l=e[429],c=e[430],f=e[431],m=e[432],v=e[433],p=e[434],d=e[435],g=e[436],h=e[437],b=e[438],k=e[439],j=e[440],i=e[441],o=e[442],n=e[443],r=e[444],t=e[445],a=e[446],s=e[447],u=e[448],l=e[449],c=e[450],f=e[451],m=e[452],v=e[453],p=e[454],d=e[455],g=e[456],h=e[457],b=e[458],k=e[459],j=e[460],i=e[461],o=e[462],n=e[463],r=e[464],t=e[465],a=e[466],s=e[467],u=e[468],l=e[469],c=e[470],f=e[471],m=e[472],v=e[473],p=e[474],d=e[475],g=e[476],h=e[477],b=e[478],k=e[479],j=e[480],i=e[481],o=e[482],n=e[483],r=e[484],t=e[485],a=e[486],s=e[487],u=e[488],l=e[489],c=e[490],f=e[491],m=e[492],v=e[493],p=e[494],d=e[495],g=e[496],h=e[497],b=e[498],k=e[499],j=e[500],i=e[501],o=e[502],n=e[503],r=e[504],t=e[505],a=e[506],s=e[507],u=e[508],l=e[509],c=e[510],f=e[511],m=e[512],v=e[513],p=e[514],d=e[515],g=e[516],h=e[517],b=e[518],k=e[519],j=e[520],i=e[521],o=e[522],n=e[523],r=e[524],t=e[525],a=e[526],s=e[527],u=e[528],l=e[529],c=e[530],f=e[531],m=e[532],v=e[533],p=e[534],d=e[535],g=e[536],h=e[537],b=e[538],k=e[539],j=e[540],i=e[541],o=e[542],n=e[543],r=e[544],t=e[545],a=e[546],s=e[547],u=e[548],l=e[549],c=e[550],f=e[551],m=e[552],v=e[553],p=e[554],d=e[555],g=e[556],h=e[557],b=e[558],k=e[559],j=e[560],i=e[561],o=e[562],n=e[563],r=e[564],t=e[565],a=e[566],s=e[567],u=e[568],l=e[569],c=e[570],f=e[571],m=e[572],v=e[573],p=e[574],d=e[575],g=e[576],h=e[577],b=e[578],k=e[579],j=e[580],i=e[581],o=e[582],n=e[583],r=e[584],t=e[585],a=e[586],s=e[587],u=e[588],l=e[589],c=e[590],f=e[591],m=e[592],v=e[593],p=e[594],d=e[595],g=e[596],h=e[597],b=e[598],k=e[599],j=e[600],i=e[601],o=e[602],n=e[603],r=e[604],t=e[605],a=e[606],s=e[607],u=e[608],l=e[609],c=e[610],f=e[611],m=e[612],v=e[613],p=e[614],d=e[615],g=e[616],h=e[617],b=e[618],k=e[619],j=e[620],i=e[621],o=e[622],n=e[623],r=e[624],t=e[625],a=e[626],s=e[627],u=e[628],l=e[629],c=e[630],f=e[631],m=e[632],v=e[633],p=e[634],d=e[635],g=e[636],h=e[637],b=e[638],k=e[639],j=e[640],i=e[641],o=e[642],n=e[643],r=e[644],t=e[645],a=e[646],s=e[647],u=e[648],l=e[649],c=e[650],f=e[651],m=e[652],v=e[653],p=e[654],d=e[655],g=e[656],h=e[657],b=e[658],k=e[659],j=e[660],i=e[661],o=e[662],n=e[663],r=e[664],t=e[665],a=e[666],s=e[667],u=e[668],l=e[669],c=e[670],f=e[671],m=e[672],v=e[673],p=e[674],d=e[675],g=e[676],h=e[677],b=e[678],k=e[679],j=e[680],i=e[681],o=e[682],n=e[683],r=e[684],t=e[685],a=e[686],s=e[687],u=e[688],l=e[689],c=e[690],f=e[691],m=e[692],v=e[693],p=e[694],d=e[695],g=e[696],h=e[697],b=e[698],k=e[699],j=e[700],i=e[701],o=e[702],n=e[703],r=e[704],t=e[705],a=e[706],s=e[707],u=e[708],l=e[709],c=e[710],f=e[711],m=e[712],v=e[713],p=e[714],d=e[715],g=e[716],h=e[717],b=e[718],k=e[719],j=e[720],i=e[721],o=e[722],n=e[723],r=e[724],t=e[725],a=e[726],s=e[727],u=e[728],l=e[729],c=e[730],f=e[731],m=e[732],v=e[733],p=e[734],d=e[735],g=e[736],h=e[737],b=e[738],k=e[739],j=e[740],i=e[741],o=e[742],n=e[743],r=e[744],t=e[745],a=e[746],s=e[747],u=e[748],l=e[749],c=e[750],f=e[751],m=e[752],v=e[753],p=e[754],d=e[755],g=e[756],h=e[757],b=e[758],k=e[759],j=e[760],i=e[761],o=e[762],n=e[763],r=e[764],t=e[765],a=e[766],s=e[767],u=e[768],l=e[769],c=e[770],f=e[771],m=e[772],v=e[773],p=e[774],d=e[775],g=e[776],h=e[777],b=e[778],k=e[779],j=e[780],i=e[781],o=e[782],n=e[783],r=e[784],t=e[785],a=e[786],s=e[787],u=e[788],l=e[789],c=e[790],f=e[791],m=e[792],v=e[793],p=e[794],d=e[795],g=e[796],h=e[797],b=e[798],k=e[799],j=e[800],i=e[801],o=e[802],n=e[803],r=e[804],t=e[805],a=e[806],s=e[807],u=e[808],l=e[809],c=e[810],f=e[811],m=e[812],v=e[813],p=e[814],d=e[815],g=e[816],h=e[817],b=e[818],k=e[819],j=e[820],i=e[821],o=e[822],n=e[823],r=e[824],t=e[825],a=e[826],s=e[827],u=e[828],l=e[829],c=e[830],f=e[831],m=e[832],v=e[833],p=e[834],d=e[835],g=e[836],h=e[837],b=e[838],k=e[839],j=e[840],i=e[841],o=e[842],n=e[843],r=e[844],t=e[845],a=e[846],s=e[847],u=e[848],l=e[849],c=e[850],f=e[851],m=e[852],v=e[853],p=e[854],d=e[855],g=e[856],h=e[857],b=e[858],k=e[859],j=e[860],i=e[861],o=e[862],n=e[863],r=e[864],t=e[865],a=e[866],s=e[867],u=e[868],l=e[869],c=e[870],f=e[871],m=e[872],v=e[873],p=e[874],d=e[875],g=e[876],h=e[877],b=e[878],k=e[879],j=e[880],i=e[881],o=e[882],n=e[883],r=e[884],t=e[885],a=e[886],s=e[887],u=e[888],l=e[889],c=e[890],f=e[891],m=e[892],v=e[893],p=e[894],d=e[895],g=e[896],h=e[897],b=e[898],k=e[899],j=e[900],i=e[901],o=e[902],n=e[903],r=e[904],t=e[905],a=e[906],s=e[907],u=e[908],l=e[909],c=e[910],f=e[911],m=e[912],v=e[913],p=e[914],d=e[915],g=e[916],h=e[917],b=e[918],k=e[919],j=e[920],i=e[921],o=e[922],n=e[923],r=e[924],t=e[925],a=e[926],s=e[927],u=e[928],l=e[929],c=e[930],f=e[931],m=e[932],v=e[933],p=e[934],d=e[935],g=e[936],h=e[937],b=e[938],k=e[939],j=e[940],i=e[941],o=e[942],n=e[943],r=e[944],t=e[945],a=e[946],s=e[947],u=e[948],l=e[949],c=e[950],f=e[951],m=e[952],v=e[953],p=e[954],d=e[955],g=e[956],h=e[957],b=e[958],k=e[959],j=e[960],i=e[961],o=e[962],n=e[963],r=e[964],t=e[965],a=e[966],s=e[967],u=e[968],l=e[969],c=e[970],f=e[971],m=e[972],v=e[973],p=e[974],d=e[975],g=e[976],h=e[977],b=e[978],k=e[979],j=e[980],i=e[981],o=e[982],n=e[983],r=e[984],t=e[985],a=e[986],s=e[987],u=e[988],l=e[989],c=e[990],f=e[991],m=e[992],v=e[993],p=e[994],d=e[995],g=e[996],h=e[997],b=e[998],k=e[999],j=e[1000],i=e[1001],o=e[1002],n=e[1003],r=e[1004],t=e[1005],a=e[1006],s=e[1007],u=e[1008],l=e[1009],c=e[1010],f=e[1011],m=e[1012],v=e[1013],p=e[1014],d=e[1015],g=e[1016],h=e[1017],b=e[1018],k=e[1019],j=e[1020],i=e[1021],o=e[1022],n=e[1023],r=e[1024],t=e[1025],a=e[1026],s=e[1027],u=e[1028],l=e[1029],c=e[1030],f=e[1031],m=e[1032],v=e[1033],p=e[1034],d=e[1035],g=e[1036],h=e[1037],b=e[1038],k=e[1039],j=e[1040],i=e[1041],o=e[1042],n=e[1043],r=e[1044],t=e[1045],a=e[1046],s=e[1047],u=e[1048],l=e[1049],c=e[1050],f=e[1051],m=e[1052],v=e[1053],p=e[1054],d=e[1055],g=e[1056],h=e[1057],b=e[1058],k=e[1059],j=e[1060],i=e[1061],o=e[1062],n=e[1063],r=e[1064],t=e[1065],a=e[1066],s=e[1067],u=e[1068],l=e[1069],c=e[1070],f=e[1071],m=e[1072],v=e[1073],p=e[1074],d=e[1075],g=e[1076],h=e[1077],b=e[1078],k=e[1079],j=e[1080],i=e[1081],o=e[1082],n=e[1083],r=e[1084],t=e[1085],a=e[1086],s=e[1087],u=e[1088],l=e[1089],c=e[1090],f=e[1091],m=e[1092],v=e[1093],p=e[1094],d=e[1095],g=e[1096],h=e[1097],b=e[1098],k=e[1099],j=e[1100],i=e[1101],o=e[1102],n=e[1103],r=e[1104],t=e[1105],a=e[1106],s=e[1107],u=e[1108],l=e[1109],c=e[1110],f=e[1111],m=e[1112],v=e[1113],p=e[1114],d=e[1115],g=e[1116],h=e[1117],b=e[1118],k=e[1119],j=e[1120],i=e[1121],o=e[1122],n=e[1123],r=e[1124],t=e[1125],a=e[1126],s=e[1127],u=e[1128],l=e[1129],c=e[1130],f=e[1131],m=e[1132],v=e[1133],p=e[1134],d=e[1135],g=e[1136],h=e[1137],b=e[1138],k=e[1139],j=e[1140],i=e[1141],o=e[1142],n=e[1143],r=e[1144],t=e[1145],a=e[1146],s=e[1147],u=e[1148],l=e[1149],c=e[1150],f=e[1151],m=e[1152],v=e[1153],p=e[1154],d=e[1155],g=e[1156],h=e[1157],b=e[1158],k=e[1159],j=e[1160],i=e[1161],o=e[1162],n=e[1163],r=e[1164],t=e[1165],a=e[1166],s=e[1167],u=e[1168],l=e[1169],c=e[1170],f=e[1171],m=e[1172],v=e[1173],p=e[1174],d=e[1175],g=e[1176],h=e[1177],b=e[1178],k=e[1179],j=e[1180],i=e[1181],o=e[1182],n=e[1183],r=e[1184],t=e[1185],a=e[1186],s=e[1187],u=e[1188],l=e[1189],c=e[1190],f=e[1191],m=e[1192],v=e[1193],p=e[1194],d=e[1195],g=e[1196],h=e[1197],b=e[1198],k=e[1199],j=e[1200],i=e[1201],o=e[1202],n=e[1203],r=e[1204],t=e[1205],a=e[1206],s=e[1207],u=e[1208],l=e[1209],c=e[1210],f=e[1211],m=e[1212],v=e[1213],p=e[1214],d=e[1215],g=e[1216],h=e[1217],b=e[1218],k=e[1219],j=e[1220],i=e[1221],o=e[1222],n=e[1223],r=e[1224],t=e[1225],a=e[1226],s=e[1227],u=e[1228],l=e[1229],c=e[1230],f=e[1231],m=e[1232],v=e[1233],p=e[1234],d=e[1235],g=e[1236],h=e[1237],b=e[1238],k=e[1239],j=e[1240],i=e[1241],o=e[1242],n=e[1243],r=e[1244],t=e[1245],a=e[1246],s=e[1247],u=e[1248],l=e[1249],c=e[1250],f=e[1251],m=e[1252],v=e[1253],p=e[1254],d=e[1255],g=e[1256],h=e[1257],b=e[1258],k=e[1259],j=e[1260],i=e[1261],o=e[1262],n=e[1263],r=e[1264],t=e[1265],a=e[1266],s=e[1267],u=e[1268],l=e[1269],c=e[1270],f=e[1271],m=e[1272],v=e[1273],p=e[1274],d=e[1275],g=e[1276],h=e[1277],b=e[1278],k=e[1279],j=e[1280],i=e[1281],o=e[1282],n=e[1283],r=e[1284],t=e[1285],a=e[1286],s=e[1287],u=e[1288],l=e[1289],c=e[1290],f=e[1291],m=e[1292],v=e[1293],p=e[1294],d=e[1295],g=e[1296],h=e[1297],b=e[1298],k=e[1299],j=e[1300],i=e[1301],o=e[1302],n=e[1303],r=e[1304],t=e[1305],a=e[1306],s=e[1307],u=e[1308],l=e[1309],c=e[1310],f=e[1311],m=e[1312],v=e[1313],p=e[1314],d=e[1315],g=e[1316],h=e[1317],b=e[1318],k=e[1319],j=e[1320],i=e[1321],o=e[1322],n=e[1323],r=e[1324],t=e[1325],a=e[1326],s=e[1327],u=e[1328],l=e[1329],c=e[1330],f=e[1331],m=e[1332],v=e[1333],p=e[1334],d=e[1335],g=e[1336],h=e[1337],b=e[1338],k=e[1339],j=e[1340],i=e[1341],o=e[1342],n=e[1343],r=e[1344],t=e[1345],a=e[1346],s=e[1347],u=e[1348],l=e[1349],c=e[1350],f=e[1351],m=e[1352],v=e[1353],p=e[1354],d=e[1355],g=e[1356],h=e[1357],b=e[1358],k=e[1359],j=e[1360],i=e[1361],o=e[1362],n=e[1363],r=e[1364],t=e[1365],a=e[1366],s=e[1367],u=e[1368],l=e[1369],c=e[1370],f=e[1371],m=e[1372],v=e[1373],p=e[1374],d=e[1375],g=e[1376],h=e[1377],b=e[1378],k=e[1379],j=e[1380],i=e[1381],o=e[1382],n=e[1383],r=e[1384],t=e[1385],a=e[1386],s=e[1387],u=e[1388],l=e[1389],c=e[1390],f=e[1391],m=e[1392],v=e[1393],p=e[1394],d=e[1395],g=e[1396],h=e[1397],b=e[1398],k=e[1399],j=e[1400],i=e[1401],o=e[1402],n=e[1403],r=e[1404],t=e[1405],a=e[1406],s=e[1407],u=e[1408],l=e[1409],c=e[1410],f=e[1411],m=e[1412],v=e[1413],p=e[1414],d=e[1415],g=e[1416],h=e[1417],b=e[1418],k=e[1419],j=e[1420],i=e[1421],o=e[1422],n=e[1423],r=e[1424],t=e[1425],a=e[1426],s=e[1427],u=e[1428],l=e[1429],c=e[1430],f=e[1431],m=e[1432],v=e[1433],p=e[1434],d=e[1435],g=e[1436],h=e[1437],b=e[1438],k=e[1439],j=e[1440],i=e[1441],o=e[1442],n=e[1443],r=e[1444],t=e[1445],a=e[1446],s=e[1447],u=e[1448],l=e[1449],c=e[1450],f=e[1451],m=e[1452],v=e[1453],p=e[1454],d=e[1455],g=e[1456],h=e[1457],b=e[1458],k=e[1459],j=e[1460],i=e[1461],o=e[1462],n=e[1463],r=e[1464],t=e[1465],a=e[1466],s=e[1467],u=e[1468],l=e[1469],c=e[1470],f=e[1471],m=e[1472],v=e[1473],p=e[1474],d=e[1475],g=e[1476],h=e[1477],b=e[1478],k=e[1479],j=e[1480],i=e[1481],o=e[1482],n=e[1483],r=e[1484],t=e[1485],a=e[1486],s=e[1487],u=e[1488],l=e[1489],c=e[1490],f=e[1491],m=e[1492],v=e[1493],p=e[1494],d=e[1495],g=e[1496],h=e[1497],b=e[1498],k=e[1499],j=e[1500],i=e[1501],o=e[1502],n=e[1503],r=e[1504],t=e[1505],a=e[1506],s=e[1507],u=e[1508],l=e[1509],c=e[1510],f=e[1511],m=e[1512],v=e[1513],p=e[1514],d=e[1515],g=e[1516],h=e[1517],b=e[1518],k=e[1519],j=e[1520],i=e[1521],o=e[1522],n=e[1523],r=e[1524],t=e[1525],a=e[1526],s=e[1527],u=e[1528],l=e[1529],c=e[1530],f=e[1531],m=e[1532],v=e[1533],p=e[1534],d=e[1535],g=e[1536],h=e[1537],b=e[1538],k=e[1539],j=e[1540],i=e[1541],o=e[1542],n=e[1543],r=e[1544],t=e[1545],a=e[1546],s=e[1547],u=e[1548],l=e[1549],c=e[1550],f=e[1551],m=e[1552],v=e[1553],p=e[1554],d=e[1555],g=e[1556],h=e[1557],b=e[1558],k=e[1559],j=e[1
```

67. On information and belief, the Accused Instrumentality performs the step of executing the template program (*e.g.*, code, objects, APIs, scripts, etc.) specific to the user (*e.g.*, the code and other elements composing the webpage are created for a particular user's search query) using the real-time information stored in the shared local storage device (*e.g.*, event information pulled from information source and stored at least temporarily on an Vividseats.com server) to generate the customized page (*e.g.*, event search results).

(E.g., <https://www.vividseats.com/> (for a particular user)).

FILTER RESULTS

BY DATE

- Choose Dates
- This Weekend
- Next Weekend
- This Month
- Next Month

BY DAYS

- Weekdays
- Weekends

BY VENUE

- Baltimore SoundStage

Events Near Arizona

Mon
JUN 15
8:00 PM

COIN (Rescheduled from 4/6)
The Van Buren – Phoenix, AZ

EVENTS IN ALL LOCATIONS

Sat
MAY 30
7:00 PM

COIN (Rescheduled from 3/28)
Express Live – Columbus, OH

Mon
JUN 01
7:00 PM

COIN (Rescheduled from 3/27)
House of Blues Cleveland – Cleveland, OH

Wed
JUN 03
8:00 PM

COIN (Rescheduled from 3/15)
The Fillmore Charlotte – Charlotte, NC

(E.g., <https://www.vividseats.com/Search.action?searchTerm=COIN> (for a particular user)).

68. On information and belief, the Accused Instrumentality performs the step that the template program indicates items of interest to the user; and providing the user with the customized page (e.g., the code/scripts/etc. will create a webpage that displays event information related to a user's search query). Users have events displayed based upon the users' respective locations (i.e., real-time information selected for the user's customized web page based on the customization information unique to the user such as current events).

FIND YOUR SEATS Search by team, artist, event or venue **Arizona**

TRENDING EVENTS

- Luke Bryan**
Catch country heartthrob, Luke Bryan, with ti...
- Garth Brooks**
Don't miss this Country Music Hall of Famer ...
- The Weeknd**
Don't miss your chance to see The Weeknd ...
- Lady Gaga**
Experience Lady Gaga perform live at a stadi...

COMING UP NEAR YOU

Tue
MAY 26
7:30PM

Jason Bonhams Led Zeppelin E...
Celebrity Theatre - Phoenix, AZ

JUN 2020

Arizona Diamondbacks
Chase Field - Phoenix, AZ

Mon
JUN 15
8:00PM

COIN
The Van Buren - Phoenix, AZ

Tue
JUN 16
8:00PM

Peach Pit
Crescent Ballroom - Phoenix - Phoenix, AZ

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Industry leading safety and security since 2001

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Exclusive Offers
Sign up for discounts, event alerts, and more!

As seen on ESPN!
Watch our ads and Find Your Seats!

PREV **NEXT** **VIEW MORE** **ABOUT US**

(E.g., <https://www.vividseats.com/> (for a particular user)).

FILTER RESULTS

Events Near Arizona

Mon
JUN 15
8:00 PM

COIN (Rescheduled from 4/6)
The Van Buren – Phoenix, AZ

EVENTS IN ALL LOCATIONS

Sat
MAY 30
7:00 PM

COIN (Rescheduled from 3/28)
Express Live – Columbus, OH

Mon
JUN 01
7:00 PM

COIN (Rescheduled from 3/27)
House of Blues Cleveland – Cleveland, OH

Wed
JUN 03
8:00 PM

COIN (Rescheduled from 3/15)
The Fillmore Charlotte – Charlotte, NC

(<https://www.vividseats.com/Search.action?searchTerm=COIN> (for a particular user)).

```

<a id="regionHandlerTrigger" class="vdp-type-body2--bld--truncate vdp-fab__child" onclick="vdpModal('open', 'regionHandlerModal')">
  <i class="vdp-icon">
  <span id="regionLabelPrefix" class="dn-m">Events Near</span>
  <span class="regionLabelName">Arizona</span>
</a>
</div>
</div>
</div>
</div>
</div>
<main class="vdp-container mb-3x1">
  <div class="vdp-grid--col-3">
    <div id="localEvents" class="vdp-card--list">
      <div class="vdp-card__header">
      <div class="regionalImageGrid">
        <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="itemscope itemtype="http://schema.org/Event">
          <div class="vdp-event-row">
            <time itemprop="startDate" datetime="2020-05-26" class="vdp-event-row__col--date">
            <div class="vdp-event-row__col--info">
              <p class="vdp-type-body2--compressed--blk--truncate" itemprop="name">
                Jason Bonhams Led Zeppelin E...
              </p>
            </div>
          </div>
        </a>
      </div>
    </div>
  </div>
</main>

```

Currently available location
events obtained from
information sources

(E.g., <https://www.vividseats.com/> (for a particular user)).

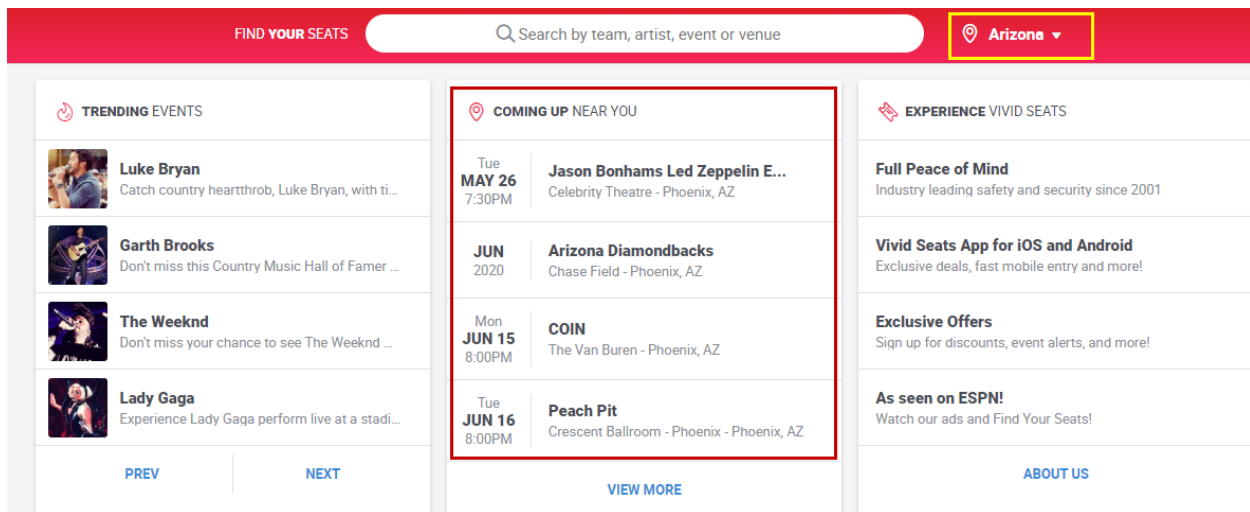
```

<div class="vdp-row">
  <section class="vdp-col--sm-12--md-8">
    <div id="productionsContainer">
      <div class="productions widget" id="widget_75b42be0-4f5f-4ed0-bb1f-3c7eed896e96">
        <script>...</script>
        <div id="reactProductionsListContainer">
          <div class="vdp-card--list" id="localEventsCard">
            <div class="vdp-fab" data-state="visible">...</div>
            <div class="vdp-card__header dn-min-t">...</div>
            <div class="vdp-card_body p-n">
              <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                <div class="vdp-event-row_col--date">...</div>
                <div class="vdp-event-row_col--info">
                  <p class="vdp-type-body2 --blk --compressed" itemprop="name">COIN (Rescheduled from 4/6)</p> == $0
                  <p class="vdp-type-small --muted" itemprop="location" itemscope itemtype="http://schema.org/Place">...</p>
                </div>
                <div class="vdp-event-row_col--button">...</div>
                <link class="schema-url" itemprop="url" href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?
utm_medium=organic&utm_source=google_eventsearch">
                <meta itemprop="sameAs" content="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?utm_medium=organic&utm_source=google_eventsearch">
                <meta itemprop="image" content="https:">
                <meta itemprop="description" content="Ticket listings for COIN (Rescheduled from 4/6) at The Van Buren in Phoenix, AZ on 6/15/2020">
                <div itemprop="offers" itemscope itemtype="http://schema.org/AggregateOffer">...</div>
                <div itemprop="performer" itemscope itemtype="http://schema.org/MusicGroup">...</div>
              </a>
            </div>
          </div>
          <div class="vdp-card--list" id="nationalEventsCard">...</div>
        </div>
      <script type="application/ld+json">...</script>
    </section>
  </div>

```

(<https://www.vividseats.com/concerts/coin-tickets.html> (for a particular user)).

69. On information and belief, the Accused Instrumentality performs the step of receiving user preferences (*e.g.*, the search terms inputted by a user such as preferences set by user for an event search) for the user, wherein the user preferences indicate the items of interest to the user (*e.g.*, events near a user location) and combining the user preferences with a generic template to form the template program specific to the user.



(*E.g.*, <https://www.vividseats.com/> (for a particular user)).

As shown below, Vividseats.com uses a generic template to define how the webpage should generally be laid out and displayed.

```

</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-r" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;"></div>
    <header id="siteHeader" class="site-header">
      <div class="vdp-container site-header__container"></div>
      <div id="mobileNavBackdrop" class="vdp-backdrop dn-min-t" data-for="siteHeaderNav"></div>
    </header>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel" class="carousel"></div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg"></div>
    <main class="vdp-container mb-3xl">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header"></div> == $0
          <div class="regionalImageGrid"></div>
          <div class="vdp-card__footer--centered"></div>
        </div>
        <div id="trendingEvents" class="vdp-card--list"></div>
        <div id="aboutLinks" class="vdp-card--list">
          <div class="vdp-card__header"></div>
          <a href="/is-vivid-seats-legitimate-and-reliable.html" class="vdp-event-row"></a>
          <a href="/vivid-seats-app.html" class="vdp-event-row"></a>
          <a class="vdp-event-row" onclick="vdpModal('open', 'newsletterModal')"></a>
          <a href="https://www.vividseats.com/blog/vivid-seats-debuts-inaugural-national-advertising-campaign" class="vdp-event-row"></a>
          <div class="vdp-card__footer--centered"></div>
        </div>
        <div class="vdp-card"></div>
        <div class="vdp-card"></div>
      </div>
    </main>
  </div>
</body>

```

General template
used to generate
webpage

(E.g., <https://www.vividseats.com/> (for a particular user)).

```

</header>
<div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
<script type="application/json"></script>
<script type="text/javascript"></script>
<script type="text/javascript"></script>
<div class="vdp-page-hero--fade"

--tabbed "></div>
<link href="/a.vstatic.com/web/a1a342f/_/brandEnforcement/brandEnforcement.css" rel="stylesheet">
<main class="vdp-container vdp-main-content">
  <div class="vdp-row">
    <section class="vdp-col--sm-12--md-8">
      <div id="productionsContainer">
        <div class="productions widget" id="widget_498b8408-ffdb-49de-bf69-b7e5b8cf3e9e">
          <script></script>
          <div id="reactProductionsListContainer">
            <div class="vdp-card--list id="localEventsCard">
              <div class="vdp-fab " data-state="visible"></div>
              <div class="vdp-card__header dn-min-t"></div>
              <div class="vdp-card__body p-n">
                <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                  <div class="vdp-event-row__col--date">
                    <meta itemprop="startDate" title="1592231400" content="2020-06-15">
                    <meta itemprop="endDate" title="1592231400" content="2020-06-15">
                    <p class="vdp-type-small --muted --center">Mon</p>
                    <p class="vdp-type-body2 --blk --compressed --center --uppercase">Jun 15</p> == $0
                  </div>
                </a>
              </div>
            </div>
          </div>
        </div>
      </section>
    </div>
  </main>
</div>

```

General template used to
generate webpage after
inputting particular search
event by a user

(E.g., <https://www.vividseats.com/concerts/coin-tickets.html> (for a particular user)).

As shown below, Vividseats.com will then combine the template with customized data pulled based upon a user's search inputs in order to create a template program executable by a user's browser, so that the customized webpage can be displayed to the user.



```

<head>...</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-r" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;"></div>
    <header id="siteHeader" class="site-header">...</header>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel" class="carousel">...</div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg">...</div>
    <main class="vdp-container mb-3xl">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card_header">...</div>
          <div class="regionalImageGrid">
            <a href="https://concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="itemscope itemtype="http://schema.org/Event">...</a>
            <div class="vdp-event-row"></div>
            <div itemprop="location" itemscope itemtype="http://schema.org/Place">...</div>
            <meta itemprop="description" content="Ticket listings for Jason Bonhams Led Zeppelin E...">
            <meta itemprop="image" content="/v4/images/event/generic/rock.jpg">
            <meta itemprop="endDate" content="2020-05-26">
          </a>
          <a href="/mlb-baseball/arizona-diamondbacks-tickets.html" class="itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" class="itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/peach-pit-tickets/peach-pit-crescent-ballroom-phoenix-6-16-3418742.html" class="itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/chicago-tickets/chicago-akchin-pavilion-6-20-3358437.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/theatre/iliiza-shlesinger-tickets/iliiza-shlesinger-3-21-3334962.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/trixie-mattel-tickets/trixie-mattel-protheum-theatre-phoenix-3-13-3309336.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
          <a href="/concerts/lane-8-tickets/lane-8-the-van-buren-3-14-3272819.html" class=" dn-min-t" itemscope itemtype="http://schema.org/Event">...</a>
        </div>
      </div>
    </main>
  </div>
</body>

```

(E.g., <https://www.vividseats.com/> (for a particular user)).

70. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '414 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

71. On information and belief, Defendant has had at least constructive notice of the '414 patent by operation of law, and there are no marking requirements that have not been complied with.

VI. COUNT IV **(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,565,359)**

72. Plaintiff incorporates the above paragraphs herein by reference.

73. On July 21, 2009, United States Patent No. 7,565,359 (“the ‘359 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘359 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘359 Patent is attached hereto as Exhibit K and incorporated herein by reference.

74. Digi Portal is the assignee of all right, title and interest in the ‘359 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘359 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘359 Patent by Defendant.

75. The application leading to the ‘359 patent was filed January 22, 2007, as a continuation of application no. 09/393,718, which issued as the ‘414 patent, which was a continuation of application no. 08/873,975, which issued as the ‘227 patent. (Ex. K at cover). The ‘359 patent was first assigned to Yahoo! Inc. (*Id.*).

76. The invention in the ‘359 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:22-27).

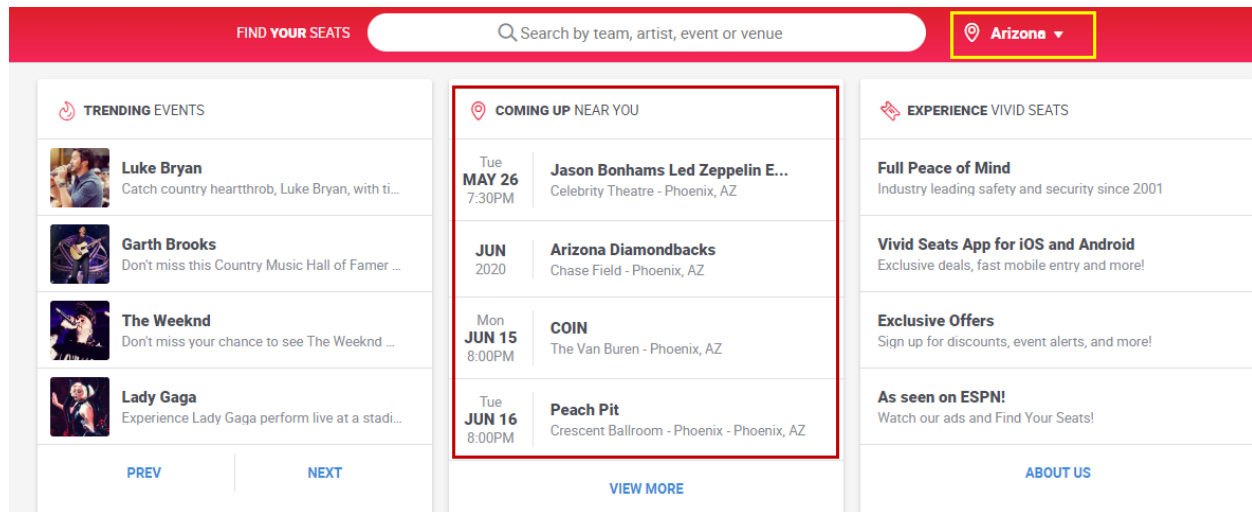
77. The ‘359 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘359 patent highlights advantages and the unconventional features of the claimed invention. When allowing the claims of the ‘359 patent, the examiner focused on the last two limitations of the claim stating that executing the template program specific to the user using the real-time information stored in the shared local storage device to generate a customized page; and receiving user preferences for the user, and combining

the user preferences with a generic template to form the template specific to the user, wherein the user preferences indicate the items of interest to the user in conjunction with the other limitations was not found in the prior art. (Ex. L at 8).

78. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 10 of the '359 patent in Delaware, and elsewhere in the United States, by performing actions comprising making and/or using the claimed computer-readable medium comprising instructions for generating customized pages that are customized according to user preferences that performs the method steps required by the claim, including without limitation through the method implemented of providing a user's Vividseats.com page ("Accused Instrumentality"). The Accused Instrumentality utilizes a computer-readable medium comprising instructions (*e.g.*, code that is executed to create webpages) for generating customized pages (*e.g.*, user-specific web pages), wherein the customized pages are customized according to user preferences (*e.g.*, web pages will be customized to show events near a user's location).

79. On information and belief, the Accused Instrumentality performs the step of storing the real-time information in a shared local storage device (*e.g.*, event information will be pulled from a storage server/database and sent to a Vividseats.com local web/API server for processing and display). On information and belief, the Accused Instrumentality also performs the step of storing a user-specific template program (*e.g.*, instructions and data used to generate a custom user webpage are stored at least temporarily) for a plurality of users, wherein each template program indicates items of interest to a user (*e.g.*, each user's template program will include instructions, code, etc. that dictates the information that should be displayed for a user based on their search query), and is associated with a user identifier (*e.g.*, in order for a user to

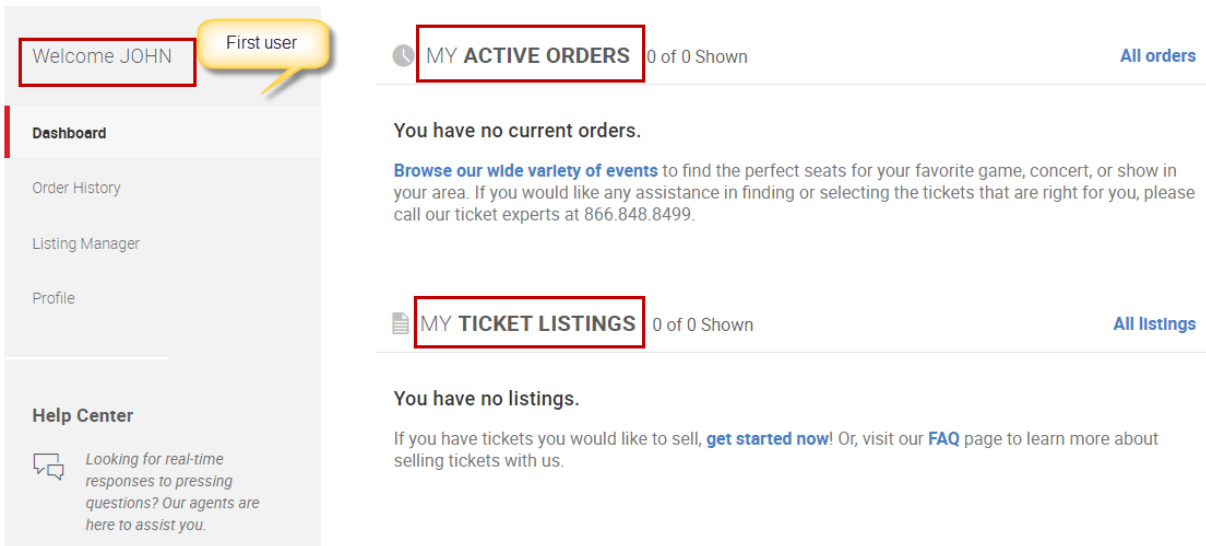
see information specific to them and their search, Vividseats.com assigns each user search an identifying number), wherein the user identifier is associated with a user request (e.g., a user search will be linked to an identifying number) for a customized page.



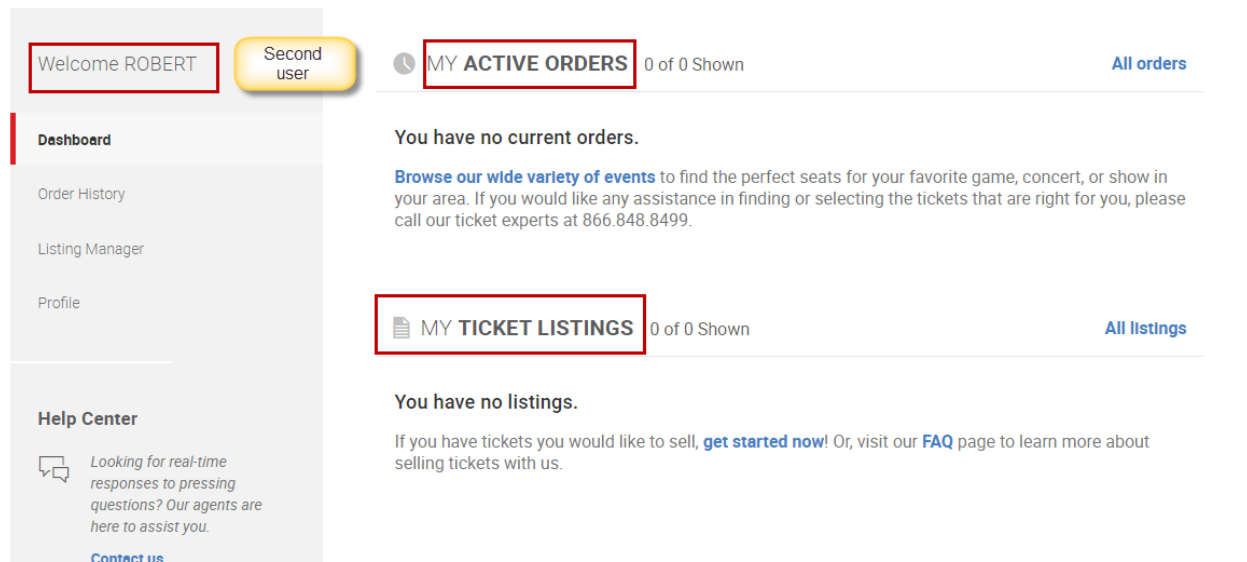
(E.g., <https://www.vividseats.com/> (for a particular user)).



(E.g., <https://www.vividseats.com/> (for a particular user)).



(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).



(E.g., <https://www.vividseats.com/account/Account.action> (for a particular user)).

80. On information and belief, the Accused Instrumentality performs the step of receiving a template program (e.g., code, instructions, etc. that are executed to create a user page) specific to the user using the user identifier (e.g., as explained above, in order to display pages customized for a user subsequent to their login, the template program used to create the customized page must be tied to the user's account credentials), wherein the template program is received from one of at least two locations (e.g., main storage at a Vividseats.com server or local

device storage), the location based upon a frequency of user requests for the customized page. In at least testing and usage, the accused instrumentality practices receiving a template program (*e.g.*, software instructions and data used for rendering a particular user's search results page such as a JavaScript page) that is unique to the user (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user configuration information (*e.g.*, a user can customize the content of their templates and what will be rendered and displayed using said templates by entering information such as their preferred location) the user configuration information being supplied by the user (*e.g.*, a user defines the information their template will display by inputting information such as their preferred location) and used to build the template program that is unique to the user (*e.g.*, user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page) and wherein the template program is received from one of at least two locations (*e.g.*, the data and templates comprising a user's page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized page (*e.g.*, based on the frequency at which a user logs in or accesses the Vividseats.com page, the data comprising the users page may be stored at a main server). The accused instrumentality uses the template program that is unique to the user which is generated using customization information unique to the user. Template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. Webpage information can be stored in a Javascript object that is used in logic to display various available events and other site logic-based conditions. The template information is stored in

multiple locations: (1) At runtime, in a Javascript object with the data structure called Context Data; (2) Within browser local storage; and (3) browser cookies.

```

<html class="no-js" lang="en-US">
  <head>...</head>
  <body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page scroll-lock">
    <div id="consent_blackbar"></div>
    <div class="vdp-wrapper">...</div>
    <aside id="newsletterModal" class="vdp-modal" data-state="closed">...</aside>
    <aside id="regionHandlerModal" class="vdp-modal--sheet--md" data-state="opened" data-scrollable="true">
      <div class="vdp-modal__container">
        <div class="vdp-modal__header">...</div>
        <div class="vdp-modal__body">
          <div id="regionError"></div>
          <div id="regionsList">
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">
              <input class="vdp-control__input" type="radio" data-region="37" hidden>
              <span class="vdp-control__span"> == $0
                ::before
                "AZ - Arizona"
              </span>
            </label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
            <label class="vdp-control--radio--block">...</label>
          </div>
        </div>
      </div>
    </aside>
  </body>
</html>

```

(<https://www.vividseats.com/> (for a particular user)).

```

e=!window.Vivid&&!window.Vivid.Analytics&&!window.Vivid.Analytics.getPageMetaDate().Event;if(!e)return{};var t=
{,n=e.eventSubCategory,r=e.eventName,i=e.eventCategory;if(n){var o=n.split(":");t.event_category=2==o.length?o[1]:n)return r&&(t.event_name=r,i&&(t.event_type=i),t)}function j(e,t){va
n=void 0===t?e:e+"",t=t+"",i="<h4>Failed to load template:"+"</hr>";return""==T[r]?":(c.a.ajax({method:"GET",async:!1,url:n,dataType:"text",success:function(e)
{i=e,T[r]=i,error:function(e,t,r){i="<p>"+("Error getting Template:"+"</p>";Text:"<hr>";Error:"<hr>";return""==T[r]?":(c.a.ajax({method:"GET",async:!1,url:n,dataType:"text",success:function(e)
{var n,r=!1;try{window.localStorage.setItem("vs_ls_test",123),window.localStorage.removeItem("vs_ls_test"),r=!0}catch(e){r=!1;if(null!=t)"object"===x(t)&&(t=JSON.stringify(t)),r?
window.localStorage.setItem(e,t):i(e,t,30);else{if(void 0===t){n=r?window.localStorage.getItem(e):function(e){for(var t=e+"",n=document.cookie.split(";"),r=0,i=n.length;r<i;r++){for(va
o=n[r];""===o.charAt(0);o=o.substring(1,o.length);if(0===o.indexOf(t))return o.substring(t.length,o.length)}return null}(e);try{n=JSON.parse(n)}catch(e){n=n}return n}null===t&&(r?
window.localStorage.removeItem(e):i(e,"",-1)))function i(e,t,n){var r,i=new Date;i.setTime(i.getTime()+24*n*60*60*1e3),r=""; expires="+i.toGMTString(),document.cookie=e+"="+t+r+"";
path="/"}function l(){if(!P(hone|od|ad)/.test(navigator.platform)){var e=navigator.appVersion.match(/OS (\d+)_(\d+)_?

```

(<https://a.vstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js> (for a particular user)).

```

[return(new Date).getTime()}{function i(e){return JSON.stringify(pt.isUndefined(e)?null:e)}function o(e){return JSON.parse(e)}}),gt=function(){function e(e){pt.bindAll(this),e=el
[],this.sizeLimit=e.sizeLimit[10,this.cache={},this.cachedKeysByAge={}}return pt.mixin(e.prototype,{get:function(e){return this.cache[e],set:function(e,t){var
1;this.cachedKeysByAge.length==this.sizeLimit&&(n=this.cachedKeysByAge.shift(),delete this.cache[n]),this.cache[e]=t,this.cachedKeysByAge.push(e)}},e}),yt=function(){var e,t,n=0,=
});function i(n){pt.bindAll(this),n=pt.isString(n)?url:n,t=t||new gt,e=pt.isNumber(n.maxParallelRequests)?
1.maxParallelRequests:6,[6,this.url,n,url,this.wildcard=n.wildcard,"%QUERY",this.filter=n.filter,this.replace=n.replace,this.ajaxSettings=
{type:"get",cache:n.cache,timeout:n.timeout,dataType:"json",beforeSend:n.beforeSend},this._get=("/throttle/i.test(n.rateLimitFn)?pt.throttle:pt.debounce
)(this._get,n.rateLimitWait[300])return pt.mixin(i.prototype,{get:function(e,n){var r=this;function i(i){var o=r.filter?r.filter(i);i;n&&(o,t.set(e,i))o()}
this._sendRequest(e).done(i):this.onDeckRequestArgs=[],slice.call(arguments,0)},_sendRequest:function(e){var t=this,i=r[e];return i||
(++i,r[e]=c.a.ajax(e,this.ajaxSettings).always((function(){void n--,r[e]=null,t.onDeckRequestArgs&&
(t._get.apply(t,t.onDeckRequestArgs),t.onDeckRequestArgs=null)})),i},get:function(e,n){var r,i,o=this,a=encodeURIComponent(e| "");return n=n||pt.noop,r=this.replace?
this.replace(this.url,a):this.url.replace(this.wildcard,a),(i=t.get(r)).pt.defer((function(){n(o.filter?o.filter(i):i)}):this._get(r,n,!i)}),i;function o(){return n(e)}
),bt=function(){var e="thumbprint",t="protocol",r="itemHash",n="adjacencyList",function i(e){pt.bindAll(this),pt.isString(e.template)&&e.engine&&c.a.error("no template engine
specified")a locally executable example a copy of the local example is available

```

(<https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js> (for a particular user)).

```

({})),!0}catch(e){return!1}var ve=function(e){W()(r,e);var t,n=(t=r,function(){var e,n=X()(t);if(ge()){var r=X()(this).constructor;e=Reflect.construct(n,arguments,r)}else e=n.apply(this,arguments);return $(t)(this,e)});function r(){var e;U()(this,r);for(var t=arguments.length,o=new Array(t),i=0;i<t;i++)o[i]=arguments[i];return e=n.call.apply[this].concat(o),l()(H)(e),"REGION_IDS",{CURRENT_LOCATION:-1,ALL_LOCATIONS:0}),l()(H)(e),"state",{errorMessage:""}),l()(H)(e),"changeRegion",function(t){window.trackLocationFabAnalytics("Select"),t===e.REGION_IDS.CURRENT_LOCATION?(e.setState({isLoadingNewRegion:!0}),window.navigator.geolocation?window.navigator.geolocation.getCurrentPosition(e.applyCurrentLocation,e.onRegionError):e.onRegionError()):e.a.get("/Region.action",{params:{region.id:t},headers:{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then(function(n){var r=n.data;e.applyRegionChange(t,Number(r.secondaryId),Number(r.tertiaryId))}).catch(function(t){p(t,{message:"Error getting region"}),e.onRegionError()}),window.Vivid.Analytics.fireInteractionAnalyticsEvent({eventCategory:"LocationSelectionUse",eventAction:"SubCategoryPageLocationDropdown",eventId:ing()))),l()(H)(e),"applyCurrentLocation",function(t){var n=t.coords.latitude,r=t.coords.longitude;re.a.get("/Region.action?applyGeoLocation",{params:{latitude:n,longitude:r},headers:{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then(function(t){var n=t.data,r=n.id,o=void 0===r?

```

(<https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/global/global.bundle.js> (for a particular user)).

81. On information and belief, the Accused Instrumentality performs that step of executing the template program (*e.g.*, code, objects, APIs, scripts, etc.) specific to the user (*e.g.*, the code and other elements composing the webpage are created for a particular user's search query) using the real-time information stored in the shared local storage device (*e.g.*, event information pulled from information source and stored at least temporarily on an Vividseats.com server) to generate the customized page (*e.g.*, event search results).

```

▼ <a id="regionHandlerTrigger" class="vdp-type-body2--bld--truncate vdp-fab__child" onclick="vdpModal('open', 'regionHandlerModal')">
  <i class="vdp-icon">□</i>
  <span id="regionLabelPrefix" class="dn-m">Events Near</span>
  <span class="regionLabelName">Arizona</span>
</a>
</div>
</div>
</div>
▼ <main class="vdp-container mb-3x1">
  ▼ <div class="vdp-grid--col-3">
    ▼ <div id="localEvents" class="vdp-card--list">
      ▶ <div class="vdp-card__header">...</div>
      <div class="regionalImageGrid">
        ▼ <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="itemscope itemtype="http://schema.org/Event">
          <div class="vdp-event-row">
            ▶ <time itemprop="startDate" datetime="2020-05-26" class="vdp-event-row__col--date">...</time>
            ▼ <div class="vdp-event-row__col--info">
              <p class="vdp-type-body2--compressed--blk--truncate" itemprop="name">
                Jason Bonhams Led Zeppelin E...
              </p>
            </div>
          </div>
        </a>
      </div>
    </div>
  </div>
</main>

```

Currently available location events obtained from information sources

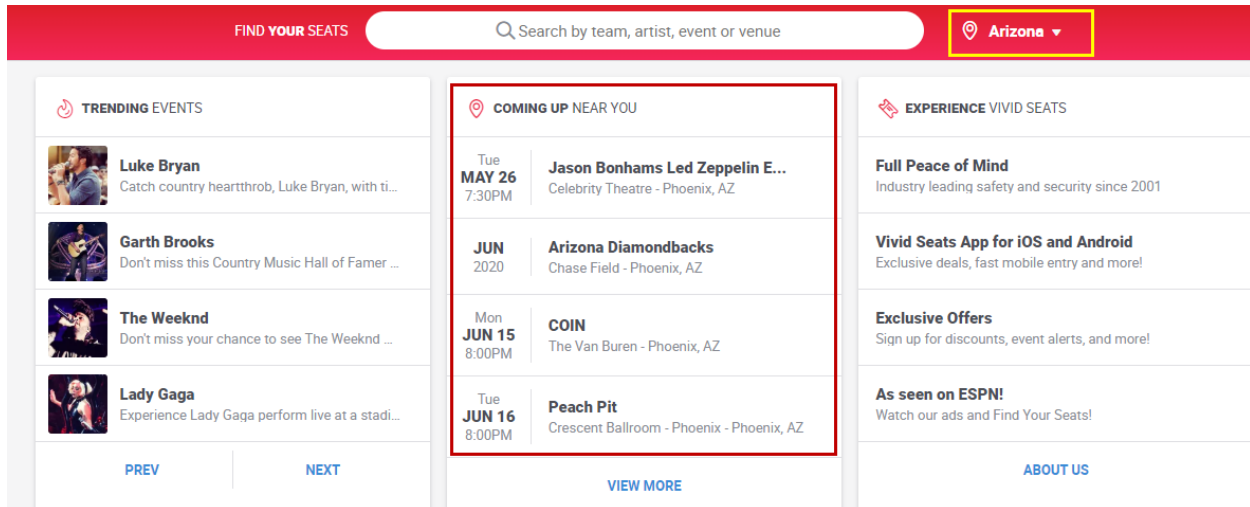
52

```

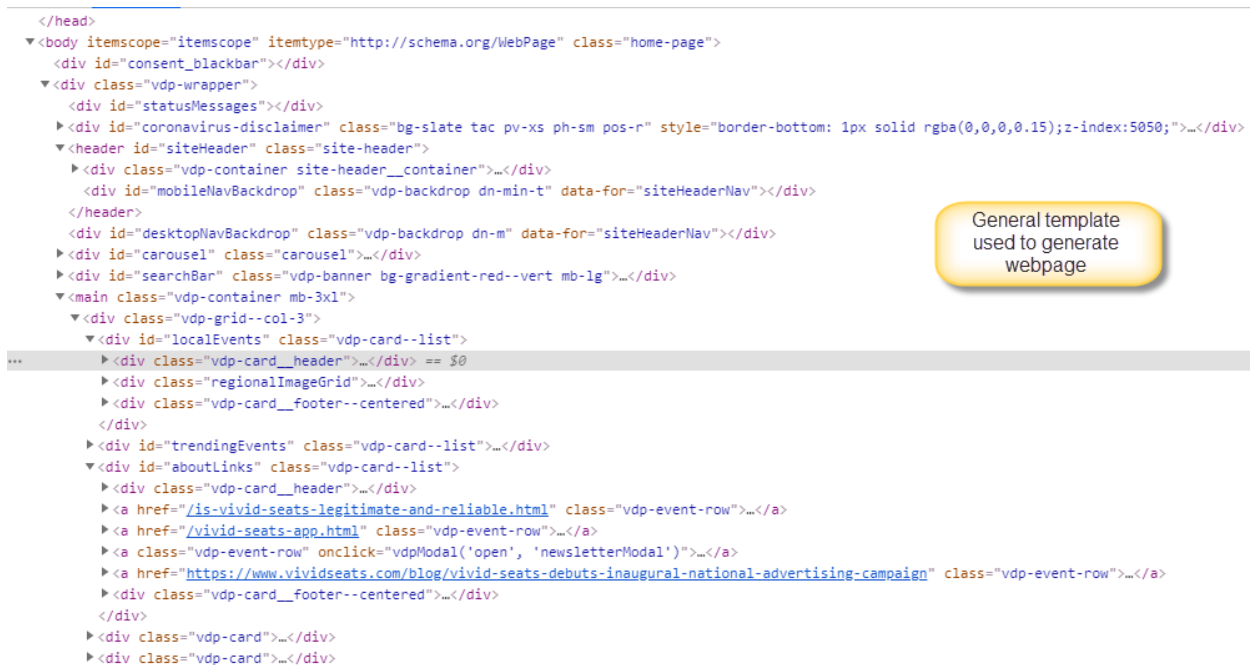
    <div class="vdp-row">
      <section class="vdp-col--sm-12--md-8">
        <div id="productionsContainer">
          <div class="productions widget" id="widget_75b42be0-4f5f-4ed0-bb1f-3c7eed896e96">
            <script>...</script>
            <div id="reactProductionsListContainer">
              <div class="vdp-card--list" id="localEventsCard">
                <div class="vdp-fab" data-state="visible">...</div>
                <div class="vdp-card__header dn-min-t">...</div>
                <div class="vdp-card_body p-n">
                  <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                    <div class="vdp-event-row_col--date">...</div>
                    <div class="vdp-event-row_col--info">
                      <p class="vdp-type-body2 --blk --compressed" itemprop="name">COIN (Rescheduled from 4/6)</p> == $0
                      <p class="vdp-type-small --muted" itemprop="location" itemscope itemtype="http://schema.org/Place">...</p>
                    </div>
                    <div class="vdp-event-row_col--button">...</div>
                    <link class="schema-url" itemprop="url" href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?
utm_medium=organic&utm_source=google_eventsearch">
                    <meta itemprop="sameAs" content="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?utm_medium=organic&utm_source=google_eventsearch">
                    <meta itemprop="image" content="https:">
                    <meta itemprop="description" content="Ticket listings for COIN (Rescheduled from 4/6) at The Van Buren in Phoenix, AZ on 6/15/2020">
                    <div itemprop="offers" itemscope itemtype="http://schema.org/AggregateOffer">...</div>
                    <div itemprop="performer" itemscope itemtype="http://schema.org/MusicGroup">...</div>
                  </a>
                </div>
              </div>
            <div class="vdp-card--list" id="nationalEventsCard">...</div>
          </div>
          <script type="application/ld+json">...</script>
        </div>
      </section>
    </div>
  
```

(E.g., <https://www.vividseats.com/> (for a particular user)).

82. On information and belief, the Accused Instrumentality performs the step of receiving user preferences for the user (e.g., the search terms inputted by a user such as preferences set by user for an event search), and for combining the user preferences with a generic template to form the template program specific to the user (e.g., the code for the entire webpage that utilizes a generic template and user's inputted search terms to create a webpage that is customized to display a user's search results), wherein the user preferences indicate the items of interest to the user.



(E.g., <https://www.vividseats.com/> (for a particular user)). As shown below, Vividseats.com uses a generic template to define how the webpage should generally be laid out and displayed.



(E.g., <https://www.vividseats.com/>).


```

</header>
<div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
<script type="application/ld+json">_</script>
<script type="text/javascript">_</script>
<script type="text/javascript">_</script>
<div class="vdp-page-hero--fade

--tabbed ">_</div>
<link href="//a.vstatic.com/web/ala342f_/brandEnforcement/brandEnforcement.css" rel="stylesheet">
<main class="vdp-container vdp-main-content">
  <div class="vdp-row">
    <section class="vdp-col--sm-12--md-8">
      <div id="productionsContainer">
        <div class="productions widget" id="widget_498b8408-ffdb-49de-bf69-b7e5b8cf3e9e">
          <script>_</script>
          <div id="reactProductionsListContainer">
            <div class="vdp-card--list" id="localEventsCard">
              <div class="vdp-fab" data-state="visible">_</div>
              <div class="vdp-card__header dn-min-t">_</div>
              <div class="vdp-card__body p-n">
                <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemType="http://schema.org/MusicEvent" data-productionid="3306247">
                  <div class="vdp-event-row__col--date">
                    <meta itemprop="startDate" title="1592231400" content="2020-06-15">
                    <meta itemprop="endDate" title="1592231400" content="2020-06-15">
                    <p class="vdp-type-small --muted --center">Mon</p>
                    <p class="vdp-type-body2 --b1k --compressed --center --uppercase">Jun 15</p> == $0

```

General template used to generate webpage after inputting particular search event by a user

(E.g., <https://www.vividseats.com/>). As shown below, Vividseats.com will then combine the template with customized data pulled based upon a user's search inputs in order to create a template program executable by a user's browser, so that the customized webpage can be displayed to the user.

```

<head>_</head>
<body itemscope="itemscope" itemType="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-n" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;">_</div>
    <header id="siteHeader" class="site-header">_</header>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel" class="carousel">_</div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg">_</div>
    <main class="vdp-container mb-3x1">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header">_</div>
          <div class="regionalImageGrid">
            <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="itemscope itemType="http://schema.org/Event">
              <div class="vdp-event-row">_</div> == $0
              <div itemprop="location" itemscope itemType="http://schema.org/Place">_</div>
              <meta itemprop="description" content="Ticket listings for Jason Bonhams Led Zeppelin E...">
              <meta itemprop="image" content="/v4/images/event/generic/rock.jpg">
              <meta itemprop="endDate" content="2020-05-26">
            </a>
            <a href="/mlb-baseball/arizona-diamondbacks-tickets.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/peach-pit-tickets/peach-pit-crescent-ballroom-phoenix-6-16-3418742.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/chicago-tickets/chicago-akchin-pavilion-6-20-3358437.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/theatre/iiiza-shiesinger-tickets/iiiza-shiesinger-3-21-3334962.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/trixie-mattel-tickets/trixie-mattel-orpheum-theatre-phoenix-3-13-3309336.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/lane-8-tickets/lane-8-the-van-buren-3-14-3272819.html" class="itemscope itemType="http://schema.org/Event">_</a>

```

Content obtained from information sources combined with template

(E.g., <https://www.vividseats.com/> (for a particular user)).

83. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '359 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

84. On information and belief, Defendant has had at least constructive notice of the '359 patent by operation of law, and there are no marking requirements that have not been complied with.

VII. COUNT V
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,626,342)

85. Plaintiff incorporates the above paragraphs herein by reference.

86. On April 18, 2017, United States Patent No. 9,626,342 ("the '342 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '342 Patent is titled "Dynamic Page Generator." The '342 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 891 days. (Ex. M). A true and correct copy of the '342 Patent is attached hereto as Exhibit M and incorporated herein by reference.

87. Digi Portal is the assignee of all right, title and interest in the '342 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '342 patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '342 patent by Defendant.

88. The application leading to the '342 patent was filed December 21, 2012, as a continuation of application no. 11/842,095, which was a continuation of application no.

11/656,636, which is a continuation of 09/393,718, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. M at cover).

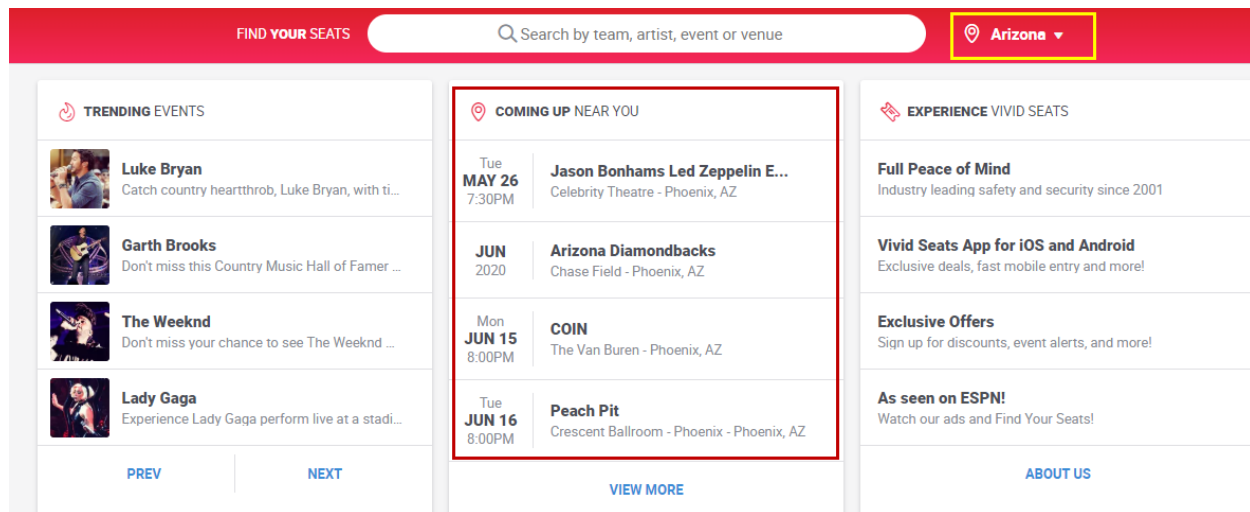
89. The invention in the '342 patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:33-37).

90. The '342 patent shares the identical specification as the '854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25.

91. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 1 of the '342 patent in Delaware, and elsewhere in the United States, by performing actions comprising performing the claimed method steps, including without limitation through the method implemented of providing a user's Vividseats.com page ("Accused Instrumentality"). The Accused Instrumentality practices the method of responding to a user request (*e.g.*, a user login request, search initiation, etc.) for a customized page (*e.g.*, a user's customized home and search pages on the Vividseats.com website). (*E.g.*, <https://www.vividseats.com/Login.action>).

92. On information and belief, the Accused Instrumentality performs the step of generating, via at least one server computer (*e.g.*, Vividseats.com server), a template program unique to the user (*e.g.*, a template program will be unique to a user because it is composed of instruction, code, and data that is processed/executed to create a webpage customized to a user), wherein the template program is generated using customization information unique to the user (*e.g.*, user search parameters and preferences) and a global template that is generic to a plurality of users (*e.g.*, a generic template that of web page layout). The accused instrumentality combines the user customization information (*e.g.*, the search terms inputted by a user such as

preferences set by user for an event search) for the user and a generic template (*e.g.*, a generic webpage template) to form a template program specific to a user (*e.g.*, the code for the entire webpage that utilizes a generic template and user's inputted search terms to create a webpage that is customized to display a user's search results).



(*E.g.*, <https://www.vividseats.com/> (for a particular user)).



(*E.g.*, <https://www.vividseats.com/> (for a particular user)).

```

    <div class="vdp-row">
      <section class="vdp-col--sm-12--md-8">
        <div id="productionsContainer">
          <div class="productions widget" id="widget_75b42be0-4f5f-4ed0-bb1f-3c7eed896e96">
            <script>...</script>
            <div id="reactProductionsListContainer">
              <div class="vdp-card--list" id="localEventsCard">
                <div class="vdp-fab" data-state="visible">...</div>
                <div class="vdp-card__header dn-min-t">...</div>
                <div class="vdp-card_body p-n">
                  <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemtype="http://
schema.org/MusicEvent" data-productionid="3306247">
                    <div class="vdp-event-row_col--date">...</div>
                    <div class="vdp-event-row_col--info">
                      <p class="vdp-type-body2 --blk --compressed" itemprop="name">COIN (Rescheduled from 4/6)</p> == $0
                      <p class="vdp-type-small --muted" itemprop="location" itemscope itemtype="http://schema.org/Place">...</p>
                    </div>
                    <div class="vdp-event-row_col--button">...</div>
                    <link class="schema-url" itemprop="url" href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?
utm_medium=organic&utm_source=google_eventsearch">
                    <meta itemprop="sameAs" content="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html?utm_medium=organic&utm_source=google_eventsearch">
                    <meta itemprop="image" content="https:">
                    <meta itemprop="description" content="Ticket listings for COIN (Rescheduled from 4/6) at The Van Buren in Phoenix, AZ on 6/15/2020">
                    <div itemprop="offers" itemscope itemtype="http://schema.org/AggregateOffer">...</div>
                    <div itemprop="performer" itemscope itemtype="http://schema.org/MusicGroup">...</div>
                  </a>
                </div>
              </div>
              <div class="vdp-card--list" id="nationalEventsCard">...</div>
            </div>
          <script type="application/ld+json">...</script>
        </div>
      </section>
    </div>

```

(E.g., <https://www.vividseats.com/concerts/coin-tickets.html> (for a particular user)).

```

</head>
<body itemscope="itemscope" itemtype="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar">...</div>
  <div class="vdp-wrapper">
    <div id="statusMessages">...</div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-r" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;">...</div>
    <div id="siteHeader" class="site-header">
      <div class="vdp-container site-header__container">...</div>
      <div id="mobileNavBackdrop" class="vdp-backdrop dn-min-t" data-for="siteHeaderNav">...</div>
    </div>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav">...</div>
    <div id="carousel" class="carousel">...</div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-1g">...</div>
    <main class="vdp-container mb-3xl">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header">...</div> == $0
          <div class="regionalImageGrid">...</div>
          <div class="vdp-card__footer--centered">...</div>
        </div>
        <div id="trendingEvents" class="vdp-card--list">...</div>
        <div id="aboutLinks" class="vdp-card--list">
          <div class="vdp-card__header">...</div>
          <a href="/is-vivid-seats-legitimate-and-reliable.html" class="vdp-event-row">...</a>
          <a href="/vivid-seats-app.html" class="vdp-event-row">...</a>
          <a class="vdp-event-row" onclick="vdpModal('open', 'newsletterModal')">...</a>
          <a href="https://www.vividseats.com/blog/vivid-seats-debuts-inaugural-national-advertising-campaign" class="vdp-event-row">...</a>
          <div class="vdp-card__footer--centered">...</div>
        </div>
        <div class="vdp-card">...</div>
        <div class="vdp-card">...</div>
      </div>
    </main>
  </div>
</body>

```

General template
used to generate
webpage

(E.g., <https://www.vividseats.com/> (for a particular user)).

```

</header>
<div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
<script type="application/ld+json">_</script>
<script type="text/javascript">_</script>
<script type="text/javascript">_</script>
<div class="vdp-page-hero--fade

--tabbed ">_</div>
<link href="//a.vstatic.com/web/ala342f_/brandEnforcement/brandEnforcement.css" rel="stylesheet">
<main class="vdp-container vdp-main-content">
  <div class="vdp-row">
    <section class="vdp-col--sm-12--md-8">
      <div id="productionsContainer">
        <div class="productions widget" id="widget_498b8408-ffdb-49de-bf69-b7e5b8cf3e9e">
          <script>_</script>
          <div id="reactProductionsListContainer">
            <div class="vdp-card--list" id="localEventsCard">
              <div class="vdp-fab" data-state="visible">_</div>
              <div class="vdp-card__header dn-min-t">_</div>
              <div class="vdp-card__body p-n">
                <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" role="row" class="vdp-anchor vdp-event-row" itemscope itemType="http://schema.org/MusicEvent" data-productionid="3306247">
                  <div class="vdp-event-row__col--date">
                    <meta itemprop="startDate" title="1592231400" content="2020-06-15">
                    <meta itemprop="endDate" title="1592231400" content="2020-06-15">
                    <p class="vdp-type-small --muted --center">Mon</p>
                    <p class="vdp-type-body2 --b1k --compressed --center --uppercase">Jun 15</p> == $0

```

General template used to generate webpage after inputting particular search event by a user

(E.g., <https://www.vividseats.com/> (for a particular user)).

As shown below, Vividseats.com will then combine the template with customized data pulled based upon a user's search inputs in order to create a template program executable by a user's browser, so that the customized webpage can be displayed to the user.

```

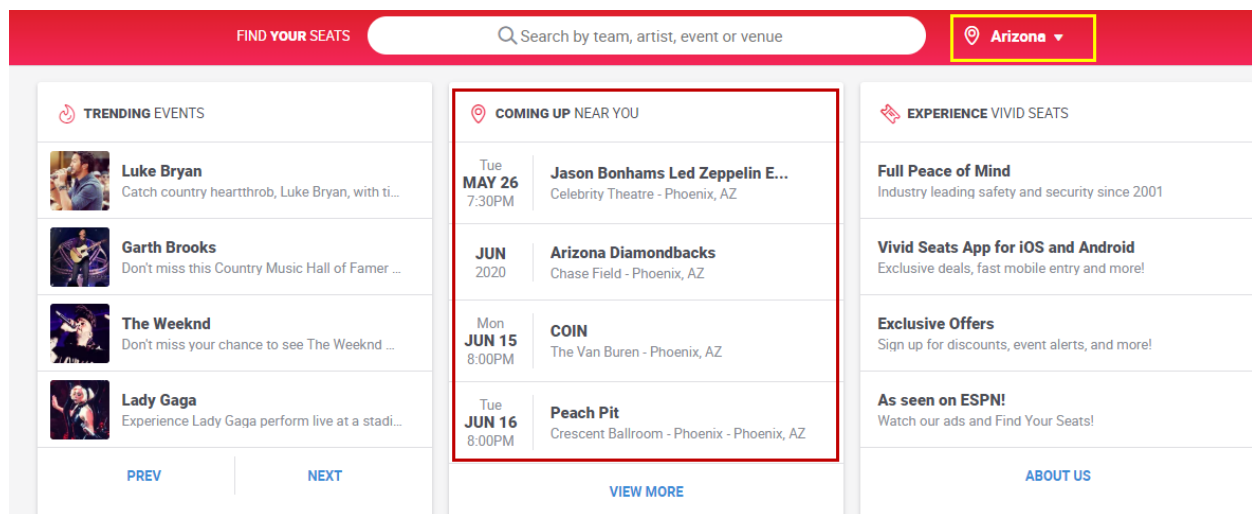
<head>_</head>
<body itemscope="itemscope" itemType="http://schema.org/WebPage" class="home-page">
  <div id="consent_blackbar"></div>
  <div class="vdp-wrapper">
    <div id="statusMessages"></div>
    <div id="coronavirus-disclaimer" class="bg-slate tac pv-xs ph-sm pos-n" style="border-bottom: 1px solid rgba(0,0,0,0.15);z-index:5050;">_</div>
    <header id="siteHeader" class="site-header">_</header>
    <div id="desktopNavBackdrop" class="vdp-backdrop dn-m" data-for="siteHeaderNav"></div>
    <div id="carousel1" class="carousel">_</div>
    <div id="searchBar" class="vdp-banner bg-gradient-red--vert mb-lg">_</div>
    <main class="vdp-container mb-3x1">
      <div class="vdp-grid--col-3">
        <div id="localEvents" class="vdp-card--list">
          <div class="vdp-card__header">_</div>
          <div class="regionalImageGrid">
            <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="itemscope itemType="http://schema.org/Event">
              <div class="vdp-event-row">_</div> == $0
              <div itemprop="location" itemscope itemType="http://schema.org/Place">_</div>
              <meta itemprop="description" content="Ticket listings for Jason Bonhams Led Zeppelin E...">
              <meta itemprop="image" content="/v4/images/event/generic/rock.jpg">
              <meta itemprop="endDate" content="2020-05-26">
            </a>
            <a href="/mlb-baseball/arizona-diamondbacks-tickets.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/coin-tickets/coin-the-van-buren-4-6-3306247.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/peach-pit-tickets/peach-pit-crescent-ballroom-phoenix-6-16-3418742.html" class="itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/chicago-tickets/chicago-akchin-pavilion-6-20-3358437.html" class="dn-min-t" itemscope itemType="http://schema.org/Event">_</a>
            <a href="/theatre/iiiza-shiesinger-tickets/iiiza-shiesinger-3-21-3334962.html" class="dn-min-t" itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/trixie-mattel-tickets/trixie-mattel-orpheum-theatre-phoenix-3-13-3309336.html" class="dn-min-t" itemscope itemType="http://schema.org/Event">_</a>
            <a href="/concerts/lane-8-tickets/lane-8-the-van-buren-3-14-3272819.html" class="dn-min-t" itemscope itemType="http://schema.org/Event">_</a>

```

Content obtained from information sources combined with template

(E.g., <https://www.vividseats.com/> (for a particular user)).

93. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (*e.g.*, Vividseats.com server), the user's template program (*e.g.*, instructions, code and data used to create a user webpage) to generate the user's customized web page, the user's customized web page including real-time information (*e.g.*, event search results) selected for the user's customized web page based on the customization information unique to the user (*e.g.*, event information will be gathered based upon a user's search parameters and preferences). The accused instrumentality serves via the at least one server computer (*e.g.*, the Vividseats.com server), the user's customized web page (*e.g.*, event results).



(*E.g.*, <https://www.vividseats.com/> (for a particular user)).

```

    <a id="regionHandlerTrigger" class="vdp-type-body2--bld--truncate vdp-fab__child" onclick="vdpModal('open', 'regionHandlerModal')">
      <i class="vdp-icon">□</i>
      <span id="regionLabelPrefix" class="dn-m">Events Near</span>
      <span class="regionLabelName">Arizona</span>
    </a>
  </div>
</div>
</div>
</div>
<main class="vdp-container mb-3x1">
  <div class="vdp-grid--col-3">
    <div id="localEvents" class="vdp-card--list">
      <div class="vdp-card__header"></div>
      <div class="regionalImageGrid">
        <a href="/concerts/jason-bonhams-led-zeppelin-experience-tickets/jason-bonhams-led-zeppelin-experience-celebrity-theatre-5-26-3459398.html" class="
itemscope itemtype="http://schema.org/Event">
          <div class="vdp-event-row">
            <time itemprop="startDate" datetime="2020-05-26" class="vdp-event-row__col--date"></time>
            <div class="vdp-event-row__col--info">
              <p class="vdp-type-body2--compressed--blk--truncate" itemprop="name">
                Jason Bonhams Led Zeppelin E...
              </p>
            </div>
          </div>
        </a>
      </div>
    </div>
  </div>
</main>

```

Currently available location
events obtained from
information sources

(E.g., <https://www.vividseats.com/> (for a particular user)).

94. On information and belief, the Accused Instrumentality performs the step of in response to receiving a subsequent request for the user's customized web page (e.g., the receipt of a user's search initiation); receiving, via the at least one server computer (Vividseats.com server), the template program (e.g., code, instructions, etc. that are executed to create a user page) that is unique to the user from one of at least two locations (e.g., main storage at a Vividseats.com server or local storage on the user's device), the location determined from the frequency of the request for the user's customized web page. In at least testing and usage, the accused instrumentality practices receiving a template program (e.g., software instructions and data used for rendering a particular user's search results page such as a JavaScript page) that is unique to the user (e.g., JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user configuration information (e.g., a user can customize the content of their templates and what will be rendered and displayed using said templates by entering information such as their preferred location) the user configuration information being supplied by the user (e.g., a user defines the information their template will display by inputting information such as their preferred location) and used to build the template program that is unique to the user (e.g., user configuration information is used to modify

templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page) and wherein the template program is received from one of at least two locations (*e.g.*, the data and templates comprising a user's page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized page (*e.g.*, based on the frequency at which a user logs in or accesses the Vividseats.com page, the data comprising the users page may be stored at a main server). The accused instrumentality uses the template program that is unique to the user which is generated using customization information unique to the user. Template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. Webpage information can be stored in a Javascript object that is used in logic to display various available events and other site logic-based conditions. The template information is stored in multiple locations: (1) At runtime, in a Javascript object with the data structure called Context Data; (2) Within browser local storage; and (3) browser cookies.

(E.g., <https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/home/home.bundle.js> (for a particular user)).

```

({})),l()catch(e){return!1}}var ve=function(e){W()(r,e);var t,n=(t=r,function(){var e,n=X()(t);if(ge()){var r=X()(this).constructor;e=Reflect.construct(n,arguments,r)}else e=n.apply(this,arguments);return $(this,e)});function r(){var e;U()(this,r);for(var t=arguments.length,o=new Array(t),i=0;i<t;i++)o[i]=arguments[i];return e=n.call.apply[
this].concat(o),l()(H)(e),"REGION_IDS",{CURRENT_LOCATION:-1,ALL_LOCATIONS:0}),l()(H)(e),"state",{errorMessage:""}),l()(H)(e),"changeRegion",(function(t)
{window.trackLocationFabAnalytics("Select"),t===e.REGION_IDS.CURRENT_LOCATION?(e.setState({isLoadingNewRegion:0}),window.navigator.geolocation?
window.navigator.geolocation.getCurrentPosition(e.applyCurrentLocation,e.onRegionError):e.onRegionError()):re.a.get("/Region.action",{params:{region.id:t},headers:
{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then((function(n){var
r=n.data;e.applyRegionChange(t,Number(r.secondaryId),Number(r.tertiaryId))}).catch((function(t){p(t,{message:"Error getting
region"}),e.onRegionError()})),window.Vivid.Analytics.fireInteractionAnalyticsEvent({eventCategory:"LocationSelectionUse",eventAction:"SubCategoryPageLocationDropdown",even
ing()}})),l()(H)(e),"applyCurrentLocation",(function(t){var n=t.coords.latitude,r=t.coords.longitude;re.a.get("/Region.action?applyGeoLocation",{params:
{latitude:n,longitude:r},headers:{Accept:"application/json,text/javascript,*/*","Cache-Control":"no-cache"}}).then((function(t){var n=t.data,r=n.id,o=void 0===r?

```

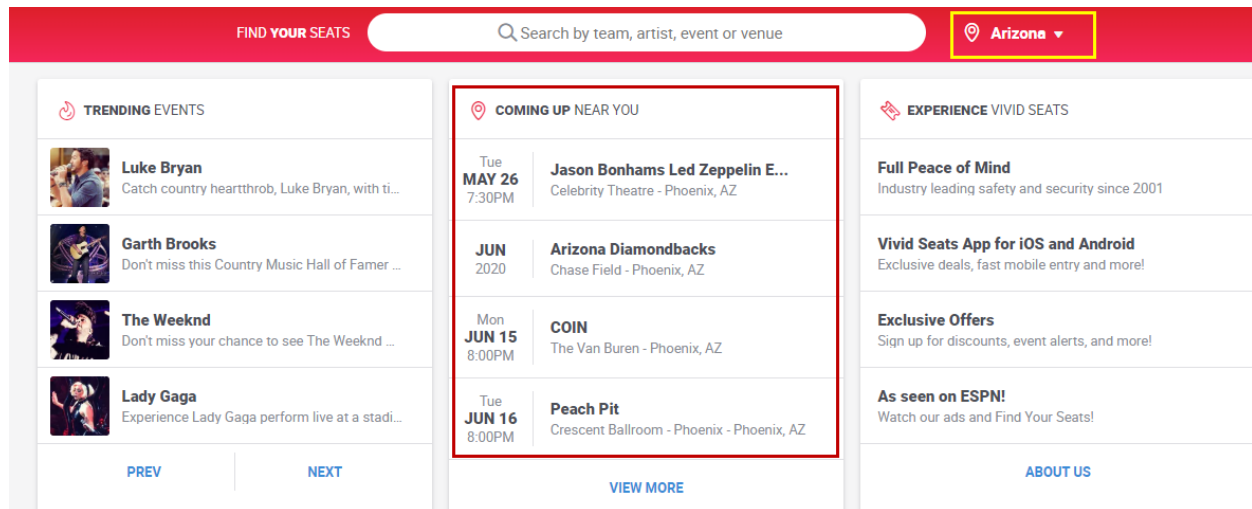
(E.g., <https://a.vsstatic.com/web/a1a342fbc051cec579fa43772559a9e8/home/home.bundle.js> (for a particular user)).

95. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (*e.g.*, Vividseats.com server), the received template program that is unique to the user (*e.g.*, instructions, code, and data that is executed to create a customized user webpage) to generate the user's customized web page, the user's customized web page including real-time information (*e.g.*, events information will be gathered based upon a user's search parameters) selected for the user's customized web page in response to the subsequent request (*e.g.*, user login, search initiation, etc.) and based on the customization information unique to the user (*e.g.*, a web page displaying event results will be created and displayed based upon a user's inputted search parameters and preferences).

(E.g., <https://www.vividseats.com/> (for a particular user)).

(E.g., <https://www.vividseats.com/> (for a particular user)).

96. On information and belief, the Accused Instrumentality performs the step of serving, via the at least one server computer (e.g., Vividseats.com server), the user's customized web page (e.g., a web page displaying event results that meet a user's inputted parameters and preferences).



(E.g., <https://www.vividseats.com/> (for a particular user)).

97. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '342 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

98. On information and belief, Defendant has had at least constructive notice of the '342 patent by operation of law, and there are no marking requirements that have not been complied with.

VIII. COUNT VI **INDIRECT INFRINGEMENT**

99. Upon information and belief, Defendant has been and now is indirectly infringing by way of inducing infringement and contributing to the infringement of at least the asserted claims of the '854 patent in the State of Delaware, in this District, and elsewhere in the United States, by providing the Accused Instrumentality and its associated server(s) and database(s) for use as described above by Defendant's customers. Defendant is a direct and indirect infringer, and its customers using the Accused Instrumentality are direct infringers.

100. A letter was sent on behalf of Digi Portal on June 26, 2020, by e-mail to Defendant stating that the Accused Instrumentality infringed claims of at least the ‘854 patent. The June 26, 2020, letter included claim charts comparing the Accused Instrumentality to claims of the ‘854 patent demonstrating infringement. Defendant therefore had actual knowledge of the ‘854 patent and its infringement at least as early as receiving the June 26, 2020, letter notifying Defendant of its infringement. Defendant has therefore also known that the use and implementation of the Accused Instrumentality by its customers infringed at least one claim of the ‘854 patent since at least receiving the June 26, 2020, letter.

101. On information and belief, since becoming aware of the ‘854 patent and of the infringement through the making, using, and/or offering the Accused Instrumentality for use by its customers, Defendant is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the Accused Instrumentality to its customers and by aiding and abetting its use in a manner known to infringe by Defendant. Since becoming aware of the infringing use of the Accused Instrumentality, Defendant knew that the use of the Accused Instrumentality by its customers constituted direct patent infringement. Despite this knowledge, Defendant continued to encourage and induce its customers to use the Accused Instrumentality to infringe as described above, and provided for use the Accused Instrumentality to infringe. Defendant therefore knowingly induced infringement and specifically intended to encourage and induce the infringement of the ‘854 patent by its customers.

102. On information and belief, since Defendant became aware of the infringement at least as of the receipt of the June 26, 2020, letter, Defendant is and has been committing the act of contributory infringement by intending to provide the Accused Instrumentality to its customers knowing that it is a material part of the invention, knowing that its use was made and

adapted for infringement of the ‘854 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use. Defendant was aware that all material claim limitations are satisfied by the use and implementation of the Accused Instrumentality by Defendant’s customers yet continued to provide the Accused Instrumentality to its customers knowing that it is a material part of the invention. As described above, since learning of the infringement at least by June 26, 2020, Defendant knew that the use and implementation of the Accused Instrumentality by its customers was made and adapted for infringement of the ‘854 patent. A new act of direct infringement occurred each time a customer used the Accused Instrumentality. After Defendant became aware that the use of the Accused Instrumentality infringes at least one claim of the ‘854 patent at least as early as June 26, 2020, Defendant knew that each such new use was made and adapted for infringement of at least one claim of the ‘854 patent and Defendant continued to provide the Accused Instrumentality for such infringing activities. Furthermore, as described more fully above, the Accused Instrumentality is not a staple article or commodity of commerce suitable for substantially noninfringing use.

IX. COUNT VII
WILLFUL INFRINGEMENT

103. Upon information and belief, Defendant has been and now is willfully infringing the asserted claims of the ‘854 patent in the State of Delaware, in this District, and elsewhere in the United States. As explained above, Defendant was informed of its infringement of the ‘854 patent by way of the June 26, 2020, letter sent to Defendant by email including claim charts demonstrating Defendant’s infringement. As a result of the letter, Defendant should have known that its actions constituted an unjustifiably high risk of infringement. Despite the letter and

knowledge that the risk of infringement was either known or so obvious that it should have been known, Defendant continued its infringing actions.

104. As a result of Defendant's willful infringement, Digi Portal is entitled to an award of treble damages.

X. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

XII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 8,352,854 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 5,983,227 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that one or more claims of United States Patent No. 7,171,414 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- d. Judgment that one or more claims of United States Patent No. 7,565,359 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- e. Judgment that one or more claims of United States Patent No. 9,626,342 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- f. Judgment that Defendant indirectly infringes, both by inducement and contributory infringement, one or more claims of United States Patent No. 8,352,854;
- g. Judgment that Defendant willfully infringes one or more claims of United States Patent No. 8,352,854;

- h. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- i. Judgment that damages should be trebled as a result of Defendant's willful infringement;
- j. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- k. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

July 28, 2020

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